

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA,))
Plaintiff,))

vs.))

CRIMINAL CASE NO. RDB-21-00054

EGHOSASERE AVBORAYE-))
IGBENIDION,))
Defendant.))

Tuesday, June 13, 2023
Courtroom 5D
Baltimore, Maryland

JURY TRIAL
EXCERPT OF MCARNOLD CHARLEMAGNE

BEFORE: THE HONORABLE RICHARD D. BENNETT, Senior Judge

For the Plaintiff:

Sean Delaney, Esquire
Christine Goo, Esquire
Assistant United States Attorneys

For the Defendant:

Alfred Guillaume, Esquire
CJA Counsel

(Computer-aided transcription of stenotype notes)

P R O C E E D I N G S

(MCARNOLD CHARLEMAGNE, duly sworn.)

THE CLERK: And please state your name for the record and spell your last name.

THE WITNESS: My name is McArnold Charlemagne, C-h-a-r-l-e-m-a-g-n-e.

THE CLERK: Thank you.

THE COURT: You may proceed, Ms. Goo.

MS. GOO: Thank you, Your Honor.

D I R E C T E X A M I N A T I O N - C O N T I N U E D

BY MS. GOO:

Q. Good morning, Mr. Charlemagne.

A. Good morning.

Q. And just a reminder to speak directly into the microphone, and if you could just make sure to speak slowly and clearly.

A. Yes. Thank you.

Q. Thank you.

So Mr. Charlemagne, we were in the middle of your direct examination when we took a recess yesterday, and I'm gonna get you back to where we were specifically, but the first thing I wanted to do this morning is to -- we talked a lot about somebody you referred to as Ego and Ghost?

A. Yes.

Q. And I'm going to show you what's marked as

1 Government's Exhibit 7. Do you recognize the person in
2 Government Exhibit 7?

3 A. Yes.

4 Q. And who is that?

5 A. That's Ego. This is Ego, yes.

6 Q. I'm not sure if you recall, the last thing I showed
7 you was some text messages and we're going to return to some
8 additional text messages.

9 A. Yes.

10 Q. So showing you what's marked as Government's Exhibit
11 60. First, direct you to the participants of the call. And do
12 you recognize who is involved in this conversation?

13 A. That's between Ego and I.

14 Q. Now, if you could first explain who the message is
15 from and what the message says for the first two messages on
16 Government Exhibit 60?

17 A. I have sent him a message, to Ego, 2165 Washington
18 Avenue, Papaluca, Florida.

19 Q. Why were you sending Ego that information?

20 A. That's a package that's coming so he has to go there.

21 Q. And what is the -- I'm sorry, what is the next message
22 after that?

23 A. I was -- I said this is where I am. So basically,
24 it's a package is here and then I pick it up and I'm waiting for
25 him to come pick me up or send me an Uber, yes.

1 Q. And if we go to page 2. And I'm sorry, could we go to
2 page 1 just for a moment. And Mr. Charlemagne, what was the
3 date of that message?

4 A. That was on July 9th, 2018.

5 Q. And what time was that?

6 A. 3:12 p.m.

7 Q. Okay. And the next message was shortly thereafter?

8 A. July 9th, 2018, 3:13 p.m.

9 Q. Okay. Thank you. And if we could go to the next
10 page. And if you could read the next message at the top.

11 If we could a zoom into those.

12 A. That's --

13 Q. I'm sorry. If you could just say the date and time of
14 that message.

15 A. July 10th, 2018.

16 Q. And what -- who's the message from and what's it say?

17 A. That's from Ego. This is from Ego.

18 Q. And what does the message say?

19 A. It says he's at the airport, BWI.

20 Q. Okay. And what airport is that?

21 A. Say again.

22 Q. What airport is that?

23 A. The Baltimore Airport, like international I believe,
24 yeah. BWI, Baltimore Airport.

25 Q. And if you could read the next set of messages

1 following, including the date and time.

2 A. It's July 10th, 2018, at 1:10 a.m. I sent to Ego. I
3 don't -- and then I also said I just landed at BWI.

4 Q. Now, why were you and Ego corresponding at this point?

5 A. I do -- for him to come pick me up, and then we're
6 going to go to Motel -- is that 6? What is it, Motel 6? So we
7 go and then -- to get ready for the operation basically.

8 Q. Okay. And if we go to the next page. And again, if
9 you could read the first two messages. Again, date and time and
10 who it's from.

11 A. Now he said he's at BWI. July 10th, 2018, 1:11 a.m.

12 Q. And what is the next message after that?

13 A. He said D Lo coming now. D Lo coming now.

14 Q. And again, what do you understand the last message to
15 mean?

16 A. So basically D Lo is going to come pick me up.

17 Q. And who is D Lo?

18 A. DiAngelo something, that is part of the group, yes.

19 Q. So DiAngelo is a part of which group?

20 A. Basically, he's with us. He -- I think he lived in
21 Baltimore so that's his spot. So he's here to pick me up so we
22 can go and then to basically do the operation basically.

23 Q. Okay. And how did you respond in the following
24 messages?

25 A. I'm at Door 8. So I believe that's Terminal 8.

1 Q. And Door 8 is where?

2 A. Say again.

3 Q. Where is Door 8?

4 A. I mean, I guess Terminal 8.

5 Q. Is that at the airport?

6 A. Yeah. The airport, yes.

7 Q. And what is the following message that you sent to
8 him?

9 A. I said good thing you called him basically.

10 Q. All right. And if we could just go show page 4, okay.
11 And the last set of messages that you sent Ego, if we could zoom
12 in on those.

13 And again, if you could state the date and time.

14 A. That's on July 11th, and I asked him to get me an Uber
15 at 8:26 p.m.

16 Q. And if you could just read the last message and the
17 date and time.

18 A. The following one you said?

19 Q. Yes, the second message as well.

20 A. I asked him to do it and yet you don't consider this
21 urgent for me.

22 Q. Okay.

23 A. And that was at July 12th, 2018, at 1:50 p.m.

24 Q. So why are you and Ego, again, having these
25 conversations about him getting you an Uber and you telling

1 him -- I guess asking him a follow-up question about whether or
2 not certain things were happening.

3 Actually, let's focus -- I'm striking that question.

4 Let's focus on the first question where you're asking
5 him to get you an Uber.

6 A. Usually I ask for an Uber to come pick me up at one
7 spot and bring me to another spot. Or if I'm done he can get
8 Uber for me and then we go to the -- to the motel basically.

9 Q. Okay.

10 A. To the location, yes.

11 Q. And what are you doing while you're moving around to
12 different places and communicating with Ego? What were you
13 doing at that point?

14 A. Basically I'm in my location waiting for the package.
15 Once the packages come that's when I communicate with him. Him
16 or Amaya basically, yes.

17 Q. Okay. And the second message dated January the 12th,
18 why did you send that message to Ego?

19 A. The 12th. Because I ask him for an Uber and he did
20 not do it basically on time. I believe this one should be for
21 me to get to one of the location or something, because usually
22 when I ask him for that, if he doesn't do it on time the next
23 package would come. So I'm asking to do Uber so I could go to
24 the next location.

25 Q. Why were you asking him to get you an Uber as opposed

1 to getting an Uber yourself?

2 A. Sometimes I do Uber for myself, but sometimes I also
3 do Uber for him as well. It's a team thing I would say. I do
4 it for him, he does it for me. Basically whoever is available
5 basically.

6 Q. Okay. And who is paying for Ubers?

7 A. We paid it ourself. We paid it ourself basically, and
8 then we get reimbursed after.

9 Q. If you could take the exhibit off the screen, please.

10 Now -- now, when you -- okay. So just returning to
11 our discussion about your role in the organization as a manager.

12 A. Yes.

13 Q. What, if anything, did you get to collect the packages
14 from everyone that was picking them up? Did you get any kind of
15 extra payment to collect the packages at the end of the day?

16 A. Not really. Not really.

17 Q. Okay. All right. And did you observe Ego -- what, if
18 anything, did you observe Ego doing in regards to picking up or
19 collecting packages?

20 A. Once Ego back, kind of very close to jail, he become
21 like the same as I, so we would -- so he would do the same thing
22 as I, pick up packages, do the recording, the -- count the money
23 and then confirm. And then also sometimes he would go to bring
24 the money to the -- I would say to the other people basically.

25 Q. Okay. All right. So before we get to taking the

1 money to the other people, I did have just one additional
2 question about the opening the packages of money.

3 A. Yes.

4 Q. Did you ever take a video -- I'm sorry, did Ego ever
5 take a video of you opening packages of money?

6 A. Yes.

7 Q. And approximately how many times did he do that for
8 you?

9 A. I would say almost all the time. If he's close, if
10 he's in with me, yes, he would do that. And if not I would try
11 to find a way to put the camera, that phone on an angle and do
12 it myself, yes.

13 Q. Was it easier to have him help you do that?

14 A. Yes, because that's -- because yeah, I trust him.
15 Yeah.

16 Q. Now we're to focus our attention now on transporting
17 the money up to the other people as you -- I think you described
18 it.

19 A. Yes.

20 Q. Now, as money comes in through the packages, what
21 would happen with the money? Like throughout the day or at the
22 end of day when you were opening the packages, where did that
23 money go?

24 A. Okay. Sometimes we -- when we -- we give the money,
25 meaning, let's say the other people, meaning the -- not people,

1 not like people like us but we were -- everybody was picking up
2 packages, right. There was other people from Baltimore, for in
3 the Baltimore area or D.C. that would come and bring us the
4 packages. And if it's I or Ego, Amaya would get the packages.
5 And we would bring it out to the motel. And sometimes we went
6 to a storage room and we bring the package there.

7 And then afterwards, when everything is done, meaning
8 at four or five, that's when the last package is picked up. We
9 would go there and start counting the money and that's how we
10 would do the buses.

11 Q. Okay. So once you have counted the money, you opened
12 up all the packages, counted the money, where does the money go
13 at that point?

14 A. During the day we -- if it's -- if it's in the motel I
15 save it basically. If it's under storage we put it in the
16 storage and we locked it and then we leave. So the next day the
17 same thing. And on Friday, that's when we do the counting of
18 all the money and then the other people who would send us the
19 location for us to bring us -- to bring them the money
20 basically.

21 Q. Now, when it came to collecting the money and then you
22 were -- you said you waited for a location from somebody?

23 A. Yes.

24 Q. And how was that information communicated to you?

25 A. They would send -- they would send to Jay and then Jay

1 would send me the location and then I would take an Uber and go
2 to the location.

3 Q. How would Jay send you that location?

4 A. If I'm with him he showed it to me and then I took the
5 Uber. And sometimes he send it via request, WhatsApp, you know,
6 via the app, WhatsApp or Wickr.

7 Q. And you did the taking of the money. Did you do that
8 in more than one city or was it just one city that you did this?

9 A. Hmm.

10 Q. Let me ask the question differently. So you talked
11 about doing the package operation in a couple different cities.

12 A. Yes.

13 Q. What cities were those?

14 A. Mostly it's Miami, Baltimore, and D.C., and -- yeah,
15 mostly, because New Jersey --

16 Q. So starting with Miami first.

17 A. Yes.

18 Q. Did you ever take the money from the end of the week
19 up to somebody in Miami?

20 A. Yes.

21 Q. And where would you take the money too? What types of
22 locations?

23 A. Like a very nice hotel. Like very nice hotel. And
24 they would tell us we are there and I go and then we bring them
25 the money basically.

1 Q. who did you meet with?

2 A. I mean, it's --

3 Q. I'm focusing just on Miami for now.

4 A. I would say he's like Indian-type looking if you don't
5 mind my saying. And also -- but like tinted, and like I don't
6 know --

7 Q. Did you know their names?

8 A. No. No. I just give it to them, but I --

9 Q. So did you -- in the various cities in Miami, D.C., or
10 Baltimore were you meeting with the same group of people or was
11 it always different?

12 A. It would be the same group but it would vary. The
13 group would have four or five people. So if I meet with that
14 guy today and I can meet with him again in another city, and I
15 can also meet with them or somebody else with him together. So
16 I know next time I see the other guy in another city I know
17 that's him. But usually it's like we are in this room or he's
18 coming one this way, having this shirt, so I know exactly this
19 is the guy. And once he's here I text Jay, Is this him? So he
20 confirming I to the room and then we start counting money.

21 Q. Okay. So again, just focusing on Miami. When you met
22 with whoever the person was that you're meeting with --

23 A. Yes.

24 Q. -- what would happen once you got to the location?

25 A. We got to the location, we go to the room, and then we

1 start counting. He brought his machine, the counting machine
2 thing, and then we start counting the money.

3 Q. And did you observe him counting the money?

4 A. Yes.

5 Q. Okay. And what happened after he finished counting
6 the money?

7 A. So he would confirm that's the amount, and then I
8 would confirm with Jay that's the amount.

9 Q. And if the amounts matched up then what happened?

10 A. Everything okay, then I leave.

11 Q. Did you take anything with you? Were you given
12 anything after they were done counting the money?

13 A. Not -- no, not with me but --

14 Q. And then where would you go to after you were done?

15 A. Basically I would go back. So if I'm in Miami I could
16 go home or I could go meet with Jay. But if I'm in those --
17 like in Baltimore or D.C., I would go to my location to where I
18 stay basically.

19 Q. Okay. All right. So we talked about Miami in terms
20 of what happened and where you went. Let's now focus back on
21 D.C.

22 A. Okay.

23 Q. So when you collected the money at the end of the week
24 in D.C., again, walk us through where you would go to meet with
25 the person.

1 A. In D.C. it's like they have -- the road that goes
2 straight to the White House. Like I think 16 or 18. Like it
3 goes straight through. They have a lot of -- that's where I
4 would go. Let's say today it's this hotel, the next day it's
5 another one. I would go there. They tell me the location and
6 also the room number and I go meet them and we go do the same
7 thing again.

8 Q. So the same thing as in counting the money?

9 A. Counting the money, yes, and they confirm and I
10 confirm and then I leave, yes.

11 Q. Okay. Now, when you were in Baltimore, where would
12 you go to meet with these folks?

13 A. Baltimore, it's also -- sometimes I go to --- I don't
14 remember if Baltimore because most of the time it's in Baltimore
15 close to D.C. so we can also -- I remember we go a lot of time
16 to D.C. even though we in Baltimore.

17 Q. Okay.

18 A. Because Jay has his part. I mean, that's -- he was
19 under my name. He has a spot in D.C. so we would count the
20 money there. Like let's say it's on Sunday, so -- and then I
21 would go to the D.C. area.

22 Q. Were there times when you went to any other cities to
23 drop off money?

24 A. I can't recall. Hold on.

25 Q. Did you ever go to New York?

1 A. Oh, yes. Yes. New York, they have -- yes. New York,
2 that's one of the main things, but they have -- but they have
3 their -- they have their friend or something, at the still.

4 Q. whose friend?

5 A. The people that's collecting the money from us. He
6 has jewelry, like that sell jewelry and I go there. They buzz
7 me in and I go there, and the room and they have the machine,
8 count the money, confirm and I confirm with Jay and then I
9 leave, yes.

10 Q. Okay. Now, again, I think I only asked this question
11 for Miami, but in the locations you met with folks that were
12 collecting the money in D.C., Baltimore, New York.

13 A. Yes.

14 Q. Did you ever walk away with anything at the end of the
15 counting of the money and the dropping off?

16 A. Not -- okay. They would give me like \$500 to like --
17 to go to that location basically. So they would pay me first
18 with you not from the money that I'm counting, they would pay me
19 beside, but the money they have to confirm with them that this
20 is this amount of money they confirm. I confirmed it then I
21 leave.

22 Q. why would they pay you?

23 A. Say again.

24 Q. why would they pay you?

25 A. I guess to give me incentive. I mean, because --

1 like, I don't know why. I don't know. I just -- yeah, they pay
2 me.

3 Q. Did Jay pay you to take the trip up to New York?

4 A. Yes. Yes.

5 Q. All right. And how much would Jay give you?

6 A. 500, yes.

7 Q. So the extra money that you got from after the drop
8 off, that was a separate 500 that you would get?

9 A. No, no, no. I mean, that's separate from the picking
10 up packages. The picking up packages I get paid every day, and
11 the 500 I would get paid for me to go to the trip, yes.

12 Q. And now you testified that you were present in the
13 room when money was being counted.

14 A. Yes.

15 Q. And if you can recall, how much money was there once
16 you total everything up for the week?

17 A. Like every week we would do average 200, 300. When
18 it's very, very good, if you don't mind me saying, we would go
19 to 600. Like I remember one time I'm counting 600, yes.

20 Q. Is it two to \$300 or 200,000?

21 A. 200,000. Sorry.

22 Q. Again was that 600 or 600,000?

23 A. The 600,000. Yes. 600,000.

24 Q. Okay. Thank you. How was the money packaged when you
25 took it up to New York?

1 A. We -- we usually by rubber bands on the way. So I'll
2 stack them in 10,000. So I put the rubber band in each corner
3 and then stack them up basically. Because when I give it to
4 them they take the pack and they put it in the machine and then
5 it -- and then it go again and again and again.

6 Q. How many times did you transport the money at the end
7 of the week?

8 A. I mean, I can't recall, but it was almost every single
9 week. And then -- and then also sometimes Amaya does it and
10 also Ego will do it, yes. So but it's a lot of time.

11 Q. So you mentioned Ego was responsible for doing it?

12 A. Yes. Yes.

13 Q. And he was responsible for transporting money?

14 A. Yes. Yes.

15 Q. Did the two of you -- did you and Ego ever talk about
16 transporting money or the money drop off?

17 A. Because I was the first one to do it, so I would kind
18 of advice to him, like the steps. It wasn't hard stuff like go
19 meet with this guy and that's it. So that's what I kind of
20 explained to him basically.

21 Q. So general information about --

22 A. General information, yes.

23 Q. Did you ever see Ego leave to do a drop?

24 A. Yes.

25 Q. And approximately how many times?

1 A. I can't recall. I would say more than five times. I
2 mean, I would say it's because it's every week so either I do it
3 or he does it, or Amaya does it, yes.

4 MS. GOO: Court's brief indulgence.

5 BY MS. GOO:

6 Q. Now, we talked about the summer of 2018 to some
7 extent. I want to focus your attention in October of 2018. Was
8 there a point in time in 2018 in which Jay went missing?

9 A. Yes.

10 Q. Okay. What do you recall of that?

11 A. He -- he was worried. Like he want to know where Jay
12 was basically. He could not hear from Jay.

13 Q. Who are you talking about?

14 A. I'm talking -- Jay is Ulysse Medard, the -- I call him
15 Jay, ask --

16 Q. Yes, Jay. Right?

17 A. He's above us, basically.

18 Q. So what do you know where Jay was?

19 A. At that time, no. The no, and then I have to do
20 further -- I have to do a lot of calling and then I found out he
21 was in jail basically.

22 Q. Okay. Now, you said you made a lot of phone calls.
23 Who did you talk to?

24 A. I mean I talked to some of his people and then I start
25 calling the -- you know, when I call into D.C. area for the, you

1 know, when people get booked, I would say the jail people. So
2 yes, I called them and then I found out he was in jail. And
3 then yes.

4 Q. Did you talk to Ego during this period of time?

5 A. Yeah. I communicate with him because he was the one
6 that was asking me and I was like oh, okay, let me see where he
7 is basically. Yeah.

8 Q. Okay. If we could pull up Government's Exhibit 60,
9 and I think go to the last page, 6 or 7, okay. Page -- I'm
10 sorry, it's marked at the bottom page 20 --

11 A. 21.

12 Q. So page 20. Directing your attention to --

13 THE COURT: This is Government's Exhibit 60?

14 MS. GOO: Government Exhibit 60, yes.

15 BY MS. GOO:

16 Q. -- and at the bottom it's page marked 20. Now, if I
17 could just focus your attention to the first message that says
18 call me ASAP. Do you see that there?

19 A. Yes, yes.

20 Q. And the next set of messages going to the bottom, who
21 are those messages from?

22 A. That was from Ego to I. To me.

23 Q. Okay. And if you could read -- actually, just going
24 to circle. If you could just read those messages.

25 A. He said to call him call me ASAP. I just ran into

1 Adam. Remember Adam? Call me back. And that was on July --
2 not -- October 7, I mean. Yeah.

3 Q. If you could just read the date and the time of the
4 messages.

5 A. Yeah, October 7, 2018. The first one is 12:50 p.m.,
6 call me ASAP. The second is also 12:50 I just ran into Adam.
7 The third one is 12:50 as well, remember Adam. And then 1:22
8 the same day he's call me back.

9 Q. And do you know why Ego was trying to get in touch
10 with you at this point?

11 A. I guess he really want to talk to me, or something
12 happened.

13 Q. And if we could go to the last page.

14 A. Oh.

15 Q. And if you could again read the date and time. Sorry,
16 just trying to --

17 A. That's the 8th of October, okay, so --

18 Q. So actually, if we could just zoom in on this message,
19 please. All right. If you could read the date and time of
20 this?

21 A. October 8 of 2018, 10:55 a.m.

22 Q. And who is the message from?

23 A. That's from Ego. The.

24 Q. And is this message to you?

25 A. Yes, to me. Yes, to me.

1 Q. If you could read this message out loud.

2 A. Okay. I'm spending what I have right now to rush to a
3 flight to D.C. Four of his workers are still there wondering
4 what happened to him because he sent them to get his Benz from
5 the dealership on Saturday and bring it to him in D.C. They
6 said the last time they heard from him was 6 p.m. on Saturday
7 and he has not been answering since he hasn't even called to get
8 his Benz that he sent them to get. His house is in my name so
9 I'm going to check there first. Him and his girlfriend cars is
10 in one of his workers name, so we're gonna put an APB out to on
11 the license plate to see if that could track them down -- sorry,
12 if this could track them down to see what happened to them. He
13 told his workers that 40 official address that they were
14 supposed to send to him Saturday -- I mean Saturday night so
15 they could have work for this week coming up, but they never got
16 a chance to send it in because he stopped answering.

17 Q. Okay. So let me just stop you there for one second.
18 So it mentions 40 official addresses for his workers to send.
19 What did you understand that to be?

20 A. Usually everyone is to get ten addresses, everybody
21 that's involved for the next week so then he could send them the
22 address so they could send the package to that location. Yes.

23 Q. Now, if you want to start up again after the three
24 dots at the bottom, starting with I wanted to fill.

25 A. Okay. I wanted to fill the gap for him until we find

1 him because I know that's what he would have ask of me. Myself
2 and the rest of his workers are going to contact lawyers and go
3 to local hospitals and police stations to see what happened to
4 him. I'll let you know the status on everything -- on
5 everything we find out or what I find when I go check the house.

6 Q. Who was in charge when Jay went missing?

7 A. That's Ego. That was Ego, yes.

8 Q. Now, did you -- there came a time in which you were
9 finished or you tried to get out of the organization is that
10 fair to say?

11 A. Uh-huh. Yes.

12 Q. Just generally, what was Jay like as a boss?

13 A. I mean, you can say he's violent. He's demanding.
14 He's like, whatever he wants that's what he should get
15 basically.

16 Q. Was he violent towards you?

17 A. Oh, yes. Yes. Yes.

18 Q. And he was demanding of you as well?

19 A. Yes. Very demanding, yes.

20 Q. Did you try to leave the organization more than once?

21 A. Yes.

22 Q. What happened the first time you tried to leave?

23 A. Okay. That was -- that was -- okay. Let me kind of
24 -- okay. The first -- first time, I don't know if you remember
25 when you showed me the wiretap, right. That was a wiretap that

1 was over 80,000 or something, and then he -- the account got
2 blocked and then he felt that I'm responsible for everything.
3 And I was like, you know what, this is too much headache. I'm
4 just going to stay home of.

5 He and Ego came to my house like blah, blah, blah.
6 And then he ask me basically to come back again. You know what,
7 enough you I honestly thought he was going to be different.

8 The second time I left there was a package in the
9 Baltimore area, I don't remember where but it was kind of like,
10 if you don't mind my saying, kind of not in a good looking area.
11 So the package -- the address was somebody -- part of a member
12 of the group was supposed to be there at the location. The
13 FedEx truck came and she was not there so the package is
14 missing. So I'm worried, you know, what, that money's missing
15 and I know he is going to make a big deal out of it.

16 So I went to the location to look for the package.
17 And when I get there, there was some guy walking and me, I don't
18 know anything I went and ask him a question. And they know that
19 I know that there's money involved and they pulled a gun on me
20 and they asked me to give them everything.

21 The funny thing is that money from a previous package.
22 So I have to give them this money plus the other money that they
23 took. And then that was like, you know what, this is too much
24 because that's kind of my life involved for what, basically.

25 Q. So you were robbed at gunpoint and you lost two

1 packages worth of money at that time?

2 A. You can say that, yes.

3 Q. Is that fair to say? The money that you had on you
4 and the package you were hoping to get?

5 A. Yes. That she was supposed to be there when the FedEx
6 come to a give the package, yes.

7 Q. And was there a second time in which you tried to get
8 out him of the organization? Or third time, I apologize.

9 A. There was another time like he really, like, get
10 violent. I mean, all the time he get violent -- blah, blah,
11 blah, talk, talk, talk. I can't remember -- I can't remember.

12 Q. So let me just rephrase the question. Did you
13 eventually leave?

14 A. Yes. I left, yes.

15 Q. And how did you leave?

16 A. I basically -- the last time basically I went to my
17 country and I stayed there. And then I came back and that's
18 basically it. So I tried to not have conversation, relation
19 with him because I did not take anything from him so he can't
20 say anything back to me so I just left basically.

21 Q. And why did you want to get out when you finally got
22 out?

23 MR. GUILLAUME: Objection.

24 THE COURT: Sustained. Sustained.

25 THE WITNESS: Answer the question or no?

1 THE COURT: Objection was sustained, meaning you don't
2 answer the question, sir.

3 THE WITNESS: Okay. Thank you.

4 BY MS. GOO:

5 Q. Just give me one moment.

6 And were you eventually arrested as part of this?

7 A. Yes.

8 Q. And do you recall when that was?

9 A. That was in December 2019.

10 Q. Okay. Now, you were charged in the federal case here
11 in the U.S. District Court for the District of Maryland,
12 correct?

13 A. Yes. Yes.

14 Q. Why did you agree to cooperate with federal
15 authorities?

16 MR. GUILLAUME: Objection.

17 THE COURT: Overruled.

18 BY MS. GOO:

19 Q. You can answer the question.

20 THE COURT: You may answer the question.

21 THE WITNESS: Oh, okay. When they first showed me the
22 details, the inside of it, I'm like oh, this is bad.

23 BY MS. GOO:

24 Q. The details of what?

25 A. What's been happening.

1 Q. And what did you learn after -- after you had been
2 arrested? What details did you learn?

3 MR. GUILLAUME: Objection, Your Honor.

4 THE COURT: Sustained.

5 MS. GOO: Okay.

6 THE COURT: Sustained.

7 BY MS. GOO:

8 Q. All right. I'll re-ask the first question I asked.
9 So you had an opportunity to review facts related to your case?

10 A. Yes.

11 Q. And how did that affect your motivation to work with
12 federal authorities?

13 A. Dealing with people live, family losing fortunes
14 basically. And that was -- that was enough for me. And then I
15 have -- I know what I've been involved in and I'm like, you know
16 what, this is what's going to happen. I mean, I can't do
17 anything because I was part of it basically. And I was, you
18 know, dealing with everything. So yes, so I said, okay, and
19 then I understand -- yes. Basically, yeah.

20 Q. Okay. And is that why you decided to cooperate?

21 A. Yes.

22 Q. Okay.

23 A. Yes.

24 MS. GOO: Court's brief indulgence.

25 Your Honor, I have no further question.

1 THE COURT: Thank you Ms. Goo.

2 And with that, cross-examination Mr. Guillaume.

3 MR. GUILLAUME: Thank you, Your Honor.

4 CROSS-EXAMINATION

5 BY MR. GUILLAUME:

6 Q. Good morning, sir.

7 A. Good morning.

8 Q. I just want to ask you a few questions.

9 A. No problem.

10 Q. You were known to members of this organization as Zo;
11 is that right?

12 A. Yes. Yes.

13 Q. In fact, you didn't -- many people did not know your
14 name was Charlemagne, you referred to yourself as Zo, right?

15 A. Okay. Yes.

16 Q. And you are from Haiti?

17 A. Yes, uh-huh.

18 Q. You mentioned that you went there for a little while
19 at some point a few moments ago. That you at some point left
20 and went to your country for awhile.

21 A. Yes.

22 Q. So am I correct that you speak Haitian, Creole,
23 correct?

24 A. Yes.

25 Q. You also speak French?

1 A. Yes.

2 Q. And Jay speaks both languages as well, correct?

3 A. Yes.

4 Q. Okay. Sir, when you first met Jay that was through
5 his uncle, Pierre; is that correct?

6 A. Yes.

7 Q. And that was in Florida?

8 A. Okay. Yes. Yes.

9 Q. And actually, when you met him, when you first met
10 Jay, you weren't working, right?

11 A. No, I was working. I have my money -- I own a
12 building, so for a friend of mine in -- what's the place again?

13 Q. So you were working?

14 A. Yes. I have my own buildings, yes.

15 Q. In Florida?

16 A. Yes. In Florida, yes.

17 Q. But were you also making fraudulent car titles using
18 Photo Shop, right?

19 A. Okay. Yes.

20 Q. Right?

21 A. I mean, no, no, no. Not now. Not at that time.

22 Q. But you had not at that time, but you have done that.
23 Isn't that what you told the FBI, that you were doing that as
24 well, making false car titles?

25 A. I -- no. I did not told them any of those, no.

1 Q. So I'm mistaken about that?

2 A. I guess, because I haven't told them that. I don't
3 know if they ever bring that up.

4 Q. So if I'm wrong forgive me.

5 A. I mean, it's okay.

6 Q. I'm sorry?

7 A. Maybe -- it's okay.

8 Q. Okay. So I want to talk about the wiretap transfers
9 first. The wiretap transfers that you talked about with Ms. Goo
10 involving Jay.

11 A. Yes.

12 Q. Okay. These transfers where you put money into an
13 account, your account, and then a friend's account at least one
14 or two times, from Jay, correct?

15 A. Yes.

16 Q. And you were told that you were going to give 15
17 percent of whatever the amount was that was going to be placed
18 into the account, right?

19 A. Yes, but -- yes.

20 Q. Right. And matter of fact, his Uncle Pierre was also
21 involved in that as well; isn't that correct?

22 A. Yes.

23 Q. And, in fact, you testified already that you did it at
24 least a couple of times, you allowed the wiretap transfer to
25 happen, and you didn't receive your 15 percent, right?

1 A. No, I did not.

2 Q. Okay. But you received some money though from that,
3 correct?

4 A. Yes. And it was taken back from Jay.

5 Q. Excuse me?

6 A. It was taken back from Jay.

7 Q. Right, because you had another person, Pierre, to pay
8 as well in that -- in that scheme; is that right?

9 A. You mean his uncle?

10 Q. His Uncle Pierre, yes.

11 A. Yes.

12 Q. Okay. So that I just want to be one hundred percent
13 clear. That that wire transfer scheme that I'm talking about is
14 totally separate from this package operation that you've
15 described; is that right?

16 A. Well, I'm sorry, what do you mean by separate?
17 Because --

18 Q. It's a separate crime. It's nothing to do with the
19 package. It's something else that you and Jay had between you
20 guys.

21 A. No. It is the same crime because I -- Jay saw packing
22 for us easier, that's why.

23 Q. Right. But before the package thing existed the wire
24 transfer thing existed, correct?

25 A. No, because the first time -- first time I met with

1 Jay he asked me to wait for a package. I waited and nothing
2 came and then he paid me. I'm like, okay. He asked me for
3 something, nothing happened and then I get paid. So I kind of
4 -- I would say there's a trust.

5 Q. So at that point then after your first package is your
6 testimony that that's when you started doing the wire transfers
7 with Jay?

8 A. On that time, yes.

9 Q. So what came first, the wire transfers or the package?

10 A. I would say packaging in bulk came afterwards but the
11 package that started, the package and then the wire transfer.
12 And then I would say that was kind of hard and then he goes to
13 the package.

14 Q. To the package, because the wire transfer was too hard
15 he decided to switch to the package operation, correct?

16 A. Yes.

17 Q. So first was the wiretaps?

18 A. No, no, no, no, no.

19 Q. So there was one incident with a box, with a package,
20 right?

21 A. Yes.

22 Q. After that with the wiretaps?

23 A. Yes.

24 Q. And then the wiretaps stopped, correct?

25 A. Yes. You can say that, yes.

1 Q. And then the package became a full-time pursuit of
2 yours, right?

3 A. Okay, yes. Yes.

4 Q. And sir, that money that you were to receive from the
5 wiretaps, that money was not -- to your knowledge, at the time
6 wasn't related to the package money, correct?

7 A. I don't think you understand. Hold on. What do you
8 mean package?

9 Q. I'm just asking that money that you did the wire
10 transfers for, you didn't earn that during -- doing the package
11 operation, correct?

12 A. Okay.

13 Q. It's a yes or no question, sir.

14 A. Because you're -- no. I would say no.

15 Q. Okay. Thank you.

16 Sir, you were promised by Jay over a million dollars
17 for working with him; is that correct?

18 A. That's how he got to me, yes.

19 Q. So Jay made you that promise?

20 A. Yes.

21 Q. Did you -- you didn't make a million dollars?

22 A. No.

23 Q. But you did receive money daily from Jay; is that
24 right?

25 A. Yes.

1 Q. He paid you every day.

2 A. Yes, every time I pick up package, yes.

3 Q. And then you paid other people as well, correct?

4 A. Not -- I -- no, Jay paid them.

5 Q. So never you, just Jay.

6 A. Unless he give me money to pay them.

7 Q. So did that happen? He gave you money to pay people?

8 A. Unless he gave me the money to pay them, so that's not
9 for me money.

10 Q. The question is, he did give you money, in fact, to
11 pay people at different points; is that correct?

12 A. Yes.

13 Q. Okay. So you did as he requested because he was a
14 demanding boss, right?

15 A. Yes.

16 Q. Okay. So he gave you money to distribute to other
17 workers, correct?

18 A. Sometimes.

19 Q. Right. He trusted you to do that.

20 A. Like -- yes, trust me -- you want me to tell other
21 people or no?

22 Q. Just asking about you right now, sir.

23 A. Yes.

24 Q. He also trusted you to rent an apartment in D.C.,
25 correct?

1 A. Yes.

2 Q. You leased an apartment in D.C., right?

3 A. Yes.

4 Q. You paid monthly rent. You personally paid the
5 monthly rent of that apartment.

6 A. No, he gave me the money to pay.

7 Q. Okay. We're -- he gave you the money?

8 A. Yes.

9 Q. And then you paid it, right?

10 A. Yes.

11 Q. Right. So you paid the money. I didn't say where the
12 money came from, just that you actually paid it, correct?

13 A. Yes.

14 Q. And when you enter into a lease to an apartment -- it
15 was a nice apartment, wasn't it?

16 A. Yes.

17 Q. A nice part of D.C.?

18 A. Yes.

19 Q. Okay. And was it a six month lease or a year lease or
20 how long was the lease?

21 A. I don't remember. I mean, I guess a year. I don't
22 remember.

23 Q. And you would meet with people related to this
24 operation with Jay at that apartment, right?

25 A. No, not at that apartment, no.

1 Q. Never?

2 A. At the apartment?

3 Q. At that apartment.

4 A. Except probably with Ego, which he was mad. That was
5 his little sanctuary basically.

6 Q. So it was an apartment that was used for relaxation.
7 Is that your testimony? That's it?

8 A. No, that's his sanctuary, that's his own spot basic.

9 Q. Jay's spot?

10 A. Yes.

11 Q. Okay. Is money stored in that apartment?

12 A. Yes, sometimes.

13 Q. Okay. And you lived there at times? You stayed
14 there?

15 A. At time, yes, you can say that.

16 Q. And when you stayed there was Jay there or you stayed
17 by yourself?

18 A. I stayed by myself, and I stayed with Jay sometimes.

19 Q. Okay. Sir, you worked with Jay in this operation from
20 approximately 2018 -- was it 2017 or 2018 is when you first
21 started?

22 A. End of 2017.

23 Q. Until the end of 2019 in December when you were
24 arrested?

25 A. No. I would say 2018. End of 2018.

1 Q. Okay.

2 A. And then I was arrested in 2019.

3 Q. So what point did you stop working for good in 2018?
4 what month was it?

5 A. I can't recall, but I would say maybe in November,
6 December.

7 Q. So November, December of 2018, you were gone at that
8 point?

9 A. Yes.

10 Q. After that point you were gone?

11 A. Yes.

12 Q. And a year later your testimony is that that's when
13 you were arrested?

14 A. Yes.

15 Q. So you didn't have any other dealings with Jay after
16 2018 -- just want to make sure I have this -- after December of
17 2018?

18 A. No dealings with Jay whatsoever after 2018.

19 Q. I'll come back to that in a moment, sir.

20 A. No problem.

21 Q. But while you were working in the operation you would
22 travel all over the country, right?

23 A. Yes.

24 Q. You even traveled once to Washington State to retrieve
25 a package; is that correct?

1 A. Yes.

2 Q. And that was a long way from Miami, correct?

3 A. Okay.

4 Q. And when you went to Washington State you went by
5 yourself, right?

6 A. Yes.

7 Q. Jay directed you to go there?

8 A. No.

9 Q. You went there on your own?

10 A. Yes.

11 Q. Now, you made reference to a conversation -- well,
12 first of all, before I get there, let me just ask you, sir:
13 During your time working with Jay, you were aware that the
14 proceeds -- there was money in these packages, right?

15 A. Yes.

16 Q. And you were aware of the source of this money?

17 A. At the beginning, no, but after -- in the middle, yes.

18 Q. So in the middle is when you found out.

19 A. From -- from Ego. Kind of -- we start putting stuff
20 together with Ego basically. From your client actually.

21 Q. So my client never told you that the money in the
22 packages came from elderly people, did he?

23 A. He did actually.

24 Q. He did?

25 A. Yes.

1 Q. What was this conversation?

2 A. That was when a location he had -- he was going to
3 pick up the package but that lady called the sender. And then I
4 don't know what they argue, and then that's how he come to me
5 and he start explaining to me. And I'm like, okay, okay, that's
6 when we start putting stuff together.

7 Q. This is what you testified to yesterday. I was just
8 going to get to that, sir, and this conversation that allegedly
9 occurred. Let's go back to when did this occur and what year?
10 What month?

11 A. I would say 2018. I mean, I don't know time. I would
12 say -- I can't give a specific month or something but I would
13 say because if Ego I would say May. From -- I would say between
14 May to December. December yes.

15 Q. So between May and December of 2018 --

16 A. Yes.

17 Q. -- in that six month or seven month timeframe, that's
18 when a conversation was had, allegedly, with my client about
19 elderly people specifically being the source of the income for
20 the money that's found in the packages. That's your testimony?

21 A. As I said, I did not say elderly but I knew it came
22 from somebody, because that person discussed that with Ego and
23 he bring that to me.

24 Q. So now you're not saying that it's necessarily someone
25 elderly you're just saying someone in general; is that right?

1 A. Yes.

2 Q. Okay. So just want to be clear about this. That you
3 presumed someone from sending money but it wasn't -- it wasn't
4 necessarily elderly; is that right? Someone elderly as opposed
5 to someone not elderly?

6 A. Hold on. Hold on. Is it based on what Ego told me or
7 is it afterward?

8 Q. No. I'm talking about what you're talking about, this
9 conversation that you allegedly had with my client.

10 A. Yes.

11 Q. And my question is, is that conversation that was in
12 reference to anybody, the source of the money be being from
13 anyone elderly specifically, correct?

14 A. I would like -- we said elderly, but we discussed as
15 far as convincing these people to send money, that's what he
16 discussed with me, yes.

17 Q. But never said elderly?

18 A. I can't say -- that was 2018. If I said I remember
19 like the time I'm sitting, oh, this is what we discussed detail
20 by detail, I'm lying. And I'm not going to be lying.

21 Q. So from May to December that's your testimony?

22 A. No. I said from May to December, yes.

23 Q. I'm going to ask you other questions now, sir.

24 A. No problem.

25 Q. And one more question about that conversation. No one

1 else was present, right, just you two allegedly?

2 A. Yes.

3 Q. Okay.

4 A. That was, like, a personal conversation.

5 Q. Sir, isn't it true that you, in fact, recently told
6 the FBI that you didn't have any idea this was an elderly scam
7 until very recently; is that true?

8 A. Yes, because I said the nature of the elderly, but I
9 knew it was convincing because when I see the fact it's based
10 only on elders, I'm like, okay, this is very, like, hard to
11 grasp. Like, we hurting those people. It's not like -- I don't
12 know.

13 Q. So in other words, when you met with the Government
14 they informed you as to what the allegations were, or some of
15 the evidence that they believe was, and that's what caused you
16 to come to the realization. Is that what you're saying?

17 A. The details, yes.

18 Q. But prior to that you didn't know. That's your
19 testimony?

20 A. I knew there was some convincing, yes.

21 Q. But you didn't know -- but you didn't know for who,
22 correct?

23 A. I'm not trying for who. What do you mean by who.

24 Q. For whom the persons are trying to be convinced. You
25 didn't know if they were of a particular type, such as elderly.

1 A. If -- if that's the way you can say, yes, but I know
2 he was convincing people.

3 Q. Okay. Sir I'll move on to some other questions.

4 A. Was -- okay. I'm sorry.

5 Q. There were -- you've testified that there were lots of
6 people working in your time with this organization, right?

7 A. Yes.

8 Q. Okay. Many of whom you don't remember their names.

9 A. Not fully, yes.

10 Q. And many people who were in different places,
11 different states, correct?

12 A. Yes.

13 Q. Okay. And you talked a little bit about this
14 yesterday. I want to focus your attention on this incident that
15 happened allegedly in Florida where you testified that
16 previously you would recruit. You personally, would recruit
17 homeowners sometimes, or ask friends of homeowners to allow
18 packages to be sent to their house, right?

19 A. No, not I, because see, I'm very not good at kind of
20 people because me, I would -- I would base it on, like, people
21 that can speak better English anyway. So I would go Ego, I
22 would say talk to people. Or are other people that's how it
23 come because I can't really convince people myself I don't know
24 if you follow.

25 Q. So you would ask other people to do it for you?

1 A. Kind of, because everybody was asked to do it. So me,
2 I bypassed them and let me ask -- yes.

3 Q. So you told a story yesterday about a package being
4 sent to his home, my client's home in Florida --

5 A. Yes.

6 Q. -- right?

7 A. Yes.

8 Q. Do you remember that his home was a target home, was
9 one of homes that were targeted?

10 A. What do you mean by targeting?

11 Q. Like someone -- do you remember who John was in the
12 organization?

13 A. Yes, I think that's Ego's friend. I think that's how
14 we know of Ego.

15 Q. Right. Exactly my next question. John gave you his
16 client's address in Florida?

17 A. Not I, Jay, yes.

18 Q. And then adjacent a package to his house, correct?

19 A. Yes.

20 Q. And then you testified yesterday about some sort of
21 interaction between my client and his mother, correct?

22 A. Yes.

23 Q. But you didn't witness that, right?

24 A. No. That's what Jay told me.

25 Q. You have no idea if that's true or not, right? It's a

1 yes or no question, sir. You didn't witness it, correct?

2 A. No, I did not witness it.

3 Q. Okay. So that's that.

4 And is my client -- you later met him, didn't tell you
5 that either, did he? That he had interaction with his mother.

6 A. John.

7 Q. No, my client. Question is not John --

8 A. No, I would never ask him of that, never.

9 Q. So the answer is no, right?

10 A. No. Okay. No.

11 Q. Sir, you were well aware during your time working with
12 Jay that he had people that he answered to, right?

13 A. Jay?

14 Q. Correct.

15 A. Yes.

16 Q. Those people were known as the bosses or the people.
17 Do you know who I'm referring to?

18 A. We can call them like that, okay.

19 Q. You had actually direct contact with them, right?

20 A. Yes.

21 Q. All right. And you were the only one that had, other
22 than Jay that had correct contact to them it; is that correct?

23 A. I don't know. I honestly don't know.

24 Q. They spoke French, right? So at least one --

25 A. Huh? I never spoke with them in French so I don't

1 know. I don't know.

2 Q. So you never spoke with the people in -- strike that.

3 A. No.

4 Q. So you were contacted at one point because there was a
5 lot of money missing, right?

6 A. Okay. Can you give me a time?

7 Q. Sure there was \$400,000 missing and the bosses
8 contacted you looking for Jay; is that right?

9 A. When? Are you talking about 2019, no? I guess.

10 Q. And you tell me, sir.

11 A. I mean, the thing is --

12 Q. Yes or no. Were you contacted by the bosses when
13 \$400,000 went missing?

14 A. I guess so, yes.

15 Q. And those people were from Canada. Is that what you
16 --

17 A. Canada? I don't know. I don't know.

18 Q. You don't remember?

19 A. I don't know.

20 Q. Okay.

21 A. Canada you say? I don't know.

22 Q. Okay. And isn't it true that the person they called,
23 you were looking for Jay's information as in his real name. Do
24 you remember that?

25 A. Okay. Yes.

1 Q. And do you remember that you gave them his real name
2 because they didn't know it? I think you testified a little bit
3 about this yesterday. They knew him as something else.

4 A. Jay? Ulysse.

5 Q. So his real name is your Ulysse Medard, right?

6 A. Yes.

7 Q. And you informed his bosses or the people that he was
8 working for that was his name, correct?

9 A. Yes.

10 Q. Okay. And at some point you and his uncle, Pierre --

11 A. Okay.

12 Q. -- tried to cut Jay out of working for the business
13 when he was disappearing, right?

14 A. Yes. No, no. Not cut him out, not cut him out. I
15 asked talked to them and then his uncle was like, listen, can we
16 ask them if it's possible? I'm like okay. The so I talked to
17 them and be like, if you can do it okay.

18 Q. And this is in 2019, right?

19 A. Yes.

20 Q. Okay. So at that point you're still in communication
21 with Jay's family and then Jay finds out about this conversation
22 later, right, about these efforts for you to work with them?

23 A. Yes.

24 Q. And he got very upset, right?

25 A. Yes.

1 Q. And he actually -- is that the time he assaulted you?
2 One of the times he assaulted you?

3 A. No, he could not find me, no.

4 Q. And he never fought you?

5 A. No, he could not find me at that time.

6 Q. He couldn't find you, okay.

7 A. Yeah.

8 Q. But he was very upset about this possibility?

9 A. You can say that, yes.

10 Q. Okay. Sir, do you know remember an individual by the
11 name of David Green working for the organization?

12 A. Yes.

13 Q. And was he in the car with you one time when Jay
14 assaulted you? When he beat you?

15 A. Huh. I can't recall.

16 Q. Okay. Well, the first part of that question is true,
17 correct, that Jay did assault you in a car one time pretty
18 badly, right?

19 A. Yes. That was -- yeah, but I don't think he was
20 there, the guy you said David Green he was -- no.

21 Q. So if you don't remember that's fine, but I just want
22 to confirm that actually happened with Jay.

23 A. Yes.

24 Q. And that was because of an issue with a package or
25 something, the reason he beat you?

1 A. No. The first time, I mean, I guess it was because of
2 the wire money thing.

3 Q. And what about the -- how many times total would you
4 say Jay assaulted you?

5 A. I can't remember.

6 Q. That's okay. More than once?

7 A. Yes, you can say that.

8 Q. Do you remember an individual by the name of Sooraji
9 Paliwal working for the organization?

10 A. What is it?

11 Q. Sooraji. Do you remember him?

12 A. Not that name, no. I don't know. Maybe from a
13 picture, I don't know.

14 Q. That's okay. If you don't know you don't know.

15 Sir, I want to focus a little bit on this money count
16 that you testified to a moment ago.

17 A. Yes.

18 Q. When you counted money you counted money by yourself;
19 is that right?

20 A. Sometimes, but also with Ego and also with Amaya.

21 Q. Never anyone else?

22 A. I -- huh. Not really. I mean with Jay. Of course
23 with Jay.

24 Q. Right.

25 A. But I don't think I would count money with other

1 people because it would kind of jeopardize. Like those other
2 people would know, in fact, there's money in the package.

3 Q. So in the different cities that you talked about going
4 to visit to drop off money, you did this every week you said?

5 A. Every week, yes.

6 Q. You always went by yourself, right?

7 A. Say again.

8 Q. You always went by yourself, correct?

9 A. No, with the team. With everybody I would say.

10 Q. So you're saying, your testimony today here is, that
11 in the -- start off with one city at a time. In D.C. you went
12 with other people, besides yourself, to do money drops. In
13 other words, you were not the only one. I'm not talking about
14 Jay, I'm talking about anybody else in D.C. all the time that
15 you dropped money you're saying that you were not alone each
16 time?

17 A. Oh, to drop the money to the big -- yes, by myself
18 yes.

19 Q. Okay. Glad we're clear on that.

20 A. Okay. I thought --

21 Q. Miami the same and New York the same, correct? Always
22 by yourself. Not -- excluding Jay, I'm not talking about Jay.

23 A. One time -- there was a guy called Damon (phonetic)
24 that was --

25 Q. But you never went with my client is my point.

1 A. With your client?

2 Q. Yes. You never went with my client to these money
3 drops.

4 A. No. When it's him and Amaya because they can do it
5 themselves.

6 Q. Sir, I asked if you ever went with him and the answer
7 is no, right?

8 A. No, okay.

9 Q. And your testimony about going to New York was that it
10 was in a jewelry store; is that right?

11 A. Yes.

12 Q. Do you remember the name of the jewelry store?

13 A. No.

14 Q. Do you remember the address of the jewelry store?

15 A. I have it saved somewhere. It's -- I know it's in
16 Manhattan.

17 Q. Manhattan is a big place. But you don't remember the
18 street it was on?

19 A. No. I mean, I have the thing written somewhere, but
20 yes.

21 Q. How many times did you go to New York during the
22 course of this -- for these money drops? More than once?

23 A. Oh, yes.

24 Q. More than ten?

25 A. Yes. Yeah, maybe.

1 Q. And the same -- does the same for hold true for Miami
2 and D.C. as well? The same, roughly -- I know you don't
3 remember every single time, but is it ten and up in these other
4 cities as well?

5 A. Yes. Miami, I would say so because -- yeah, because
6 we do every week. So I would say -- I would say -- I would say
7 more than ten in Miami.

8 Q. From Miami, right? Or you lived there -- you're from
9 Haiti but you spend a lot of your life in Miami as well,
10 correct?

11 A. Yes.

12 Q. So you're familiar with the streets and the
13 neighborhoods, right?

14 A. Not really.

15 Q. Okay.

16 A. Because I'm not really in my -- in my -- I'm am
17 Broward but my home, my -- but thing is, I -- it's like I'm not
18 familiar with the street but I know. It's like the same thing
19 for you, you use maps and stuff, this is the --

20 Q. Right. So in D.C. you did say that you were on 16th
21 Street, or the street that goes to the White House.

22 A. Yes.

23 Q. You remembered that.

24 A. 16 or 18, yeah, one of them, yes.

25 Q. Okay. Few more questions for you, sir.

1 A. No problem.

2 Q. Jay was responsible for paying everyone; is that
3 correct? We've established -- I want to make clear that's the
4 case.

5 A. Yes.

6 Q. Okay. Jay paid all of his workers.

7 A. Sometimes, yes.

8 Q. And when Jay was missing that time in October of 2018,
9 no one could get paid, right, because he was not there.

10 A. I don't know.

11 Q. You didn't get paid, did you?

12 A. I guess that time I wasn't in -- I guess I wasn't with
13 Ego. Because when Ego contacted me I guess I was in Miami. And
14 Ego was asking me, basically information, where is Jay at and
15 stuff like that. And that's when I went to do some search to
16 see where Jay was basically.

17 Q. And you learned he was in jail.

18 A. Yes.

19 Q. Okay. Now, you don't have any information that my
20 client paid anybody, do you?

21 A. You do the same thing as I, the same way that Jay
22 would give me money, they would give to Ego and stuff.

23 Q. You don't have specific information about that,
24 correct?

25 A. I do. Yes, I've seen it. It's been done with I,

1 Amaya, and Ego, yes. Because we were so close to him, like
2 those are his people that would see. Amaya, although she's from
3 Baltimore, that's how -- also kind of his girlfriend. But Ego
4 and I were from Miami. I know his uncle that's why I new him,
5 but Ego -- he start trusting Ego more.

6 Q. You know Jay's uncle, right?

7 A. Yes.

8 Q. So that's your testimony and you're sticking with
9 that. Just making sure.

10 A. Okay. Yes. Yes.

11 Q. Now, at some point, just referring back to what I was
12 talking about a moment ago, when Jay goes missing and the people
13 from wherever they're from contact you --

14 A. Uh-huh.

15 Q. -- and you propose that -- with his uncle that you
16 potentially work with them, you actually did begin to work with
17 them without Jay. I want to make clear that that happened.

18 A. Yes. Two different time.

19 Q. Right. This is in 2019 I'm referencing, right?

20 A. Yes.

21 Q. Okay. Now, sir, when you learned that there was a
22 warrant for your arrest that was December of 2019; is that
23 correct?

24 A. I did not know. They just go to my house and then
25 they do their thing basically.

1 Q. Okay. When you were arrested?

2 A. No. I mean, basically when they did go to my house I
3 wasn't at my house. I was -- I went and surrender myself, yes.

4 Q. And did you surrender yourself the same day or did it
5 take some days to do that?

6 A. The next day.

7 Q. And isn't it true that you deleted some information
8 from your phone prior to doing that?

9 A. Say again.

10 Q. That you deleted information from your phone prior to
11 turning yourself?

12 A. Yeah, I guess. Yes.

13 Q. You remember that, right?

14 A. Yes.

15 Q. Okay. Thank you.

16 MR. GUILLAUME: No further questions.

17 THE COURT: Thank you very much, Mr. Guillaume.

18 Redirect, Ms. Goo?

19 MS. GOO: Yes, Your Honor. If I may just have one
20 moment.

21 THE COURT: Sure.

22 REDIRECT EXAMINATION

23 BY MS. GOO:

24 Q. Mr. Charlemagne --

25 A. Yes.

1 Q. -- Mr. Guillaume asked you a number of questions about
2 some additional work that you did with the package scheme in
3 2019 --

4 A. Yes.

5 Q. -- and some contact with Jay's uncle. Do you recall
6 that line of questioning?

7 A. Yes.

8 Q. Now, so let me ask this question. Did there come a
9 point in time in which you took it upon yourself to do a package
10 scheme -- or stay involved in the package scheme separate from
11 Jay?

12 A. Yes. That's right, yeah.

13 Q. And was that the package that went to Washington that
14 you went to retrieve?

15 A. Yes. Yeah, it came from -- they went to Washington
16 and then -- yes, uh-huh.

17 Q. Why did you travel to Washington to get the package?

18 A. Because, I'll be honest, when they contacted me I'm
19 like, what's going on? I don't know anything as far as where
20 Jay is at and all those things, because I left Jay since -- long
21 time ago, I would say 2018. And I saw an opportunity, like, I
22 mean, I kind of got greedy. I could do as Jay was doing because
23 they contacted me. So I'm like listen, I'm going to take the
24 package so can I get paid like, as such. Be like if you can,
25 okay. So his uncle said let's go. So I go and get him, book

1 him a ticket and we went basically, yes.

2 Q. Okay. So you said you got greedy.

3 A. Yeah. You can say that, yes.

4 Q. Now, you also talked about information you knew about
5 the charges that you pled guilty to.

6 A. Yes.

7 Q. Mr. Guillaume asked you a number of questions about,
8 you know, when you learned about the information about the elder
9 fraud scheme. Do you recall that?

10 A. Yes.

11 Q. Now, I believe Mr. Guillaume asked you specifically,
12 you met with the federal authorities and talked about
13 information related to the case. Do you recall that -- that
14 line of questioning from Mr. Guillaume?

15 A. Just now, yes. He said something similar, uh-huh.

16 Q. Now, on your direct examination, when I was asking you
17 questions a little bit earlier this morning, I asked you about,
18 you know, the reason why you decided to cooperate with the
19 federal government and you stated that you had learned details
20 about the investigation.

21 A. The details, yes.

22 Q. How did you learn about the details?

23 A. Okay. When I went to Mr. Kramer -- I went, Mr. Kramer
24 showed me, it's a big book --

25 MR. GUILLAUME: Objection, Your Honor.

1 THE COURT: Sustained. Sustained. Rephrase the
2 question.

3 You should not be going into his conversations with
4 his lawyer, but he can respond in terms of what information --
5 essentially the answer is, he gained information from his lawyer
6 with respect to the nature of the scheme, correct?

7 MS. GOO: Yes, Your Honor. If I may just lead
8 slightly, I think I can get to exactly where I need to get to
9 quickly without divulging any confidential type communications.

10 THE COURT: That's all right.

11 BY MS. GOO:

12 Q. Mr. Charlemagne, is it fair you learned some of the
13 information after meeting with Mr. Kramer?

14 A. Yes.

15 Q. And you're referencing something, what are you --

16 A. That's like, I would say, I guess, all the victim or
17 most of the victim they had from the scheme I was involved in,
18 they have details like conversation with whoever.

19 MR. GUILLAUME: Objection, Your Honor.

20 THE WITNESS: No, no, no. Hold on.

21 THE COURT: No. Excuse me, sir. Sir.

22 THE WITNESS: I'm sorry.

23 THE COURT: There is an objection from a lawyer you
24 don't speak.

25 THE WITNESS: Oh, I thought --

1 THE COURT: You don't talk over a lawyer. If there is
2 an objection you stop talking until I rule on the objection. Do
3 you understand that?

4 THE WITNESS: Okay. No problem.

5 THE COURT: Your objection, Mr. Guillaume?

6 MR. GUILLAUME: Your Honor, my objection is that it
7 goes to the nature of the evidence and I don't think that's an
8 appropriate topic for the witness to delve into in front of the
9 jury.

10 THE COURT: Well, he can't comment on the nature of
11 evidence. He responded that he became aware of what he felt was
12 the extent of the fraud scheme as to the elderly. And that's
13 been explored enough, and that's fine, Ms. Goo. And move on to
14 something else. That's all we need to go through as to there.

15 MS. GOO: I'm moving on, Your Honor.

16 BY MS. GOO:

17 Q. Now, you were also asked about the conversation that
18 you had with -- actually, I'm going to back up a little bit
19 more. Striking that.

20 At the beginning of your cross-examination with Mr.
21 Guillaume, there was some discussion about what started first,
22 the package scheme or the wire, the wires that went into the
23 bank accounts.

24 A. Yes.

25 Q. And you seemed to have a little bit of difficulty

1 answering the specific questions from Mr. Guillaume. So coming
2 from you, I'm asking, why did you hesitate in saying that the
3 package or the wire fraud started first?

4 A. Okay. The way he asked the question, it's like it's a
5 yes and no. But the way it was, I would say Jay is testing.
6 Like it start with the package, right, and then he was not
7 successful yet because he was in Miami and he started doing
8 wires. And then when we went here, here is, I would say, kind
9 of easier in a way.

10 Q. And by here, what do you mean here?

11 A. What I mean, let's say -- let me give you -- like
12 Baltimore, right. There's a lot of house, vacant houses. In
13 Miami not so much. So you can find 10, 20, a 100 vacant houses
14 in Baltimore, but in Miami, not really. So only way you can get
15 vacant house is you have to convince people, okay, we're going
16 to send a package. So in Miami it's very, like you have to talk
17 to people. Meaning the same way as like the same John contact
18 Ego and then we gonna send you the package. So that's the
19 thing, we have to ask people, like if we can use it, because
20 there's not so vacant spaces. So we did and did start packages
21 before.

22 And then, because he was testing, he was like okay,
23 let me receive the wires. But the wires, after everything it
24 got blocked and frozen accounts. So then when he start here in
25 the D.C. and Baltimore area, it became so easier and that's why

1 he kind of go, like, heavy on the packaging. Yes.

2 Q. So is it fair to say he was trying out the wires and
3 packages at about the same time?

4 A. I would say yes, you could say that. Because when the
5 packages started, because as I said the first time, that's when
6 I'm like oh, he's different because he asked me to wait for a
7 package, I waited, nothing came and he paid me. I'm like, okay,
8 so he's kind of kept his word. So that's why. So when he
9 started wires, I'm like, okay, let's see.

10 Q. Thank you. Now, you mentioned John, someone that, I
11 think, on your cross-examination you said John is how you end up
12 getting to the packages sent to Ego's house; is that right?

13 A. Yes.

14 Q. Now, Mr. Guillaume asked you some questions about the
15 roughing up Ego's mother that you testified to yesterday on
16 direct examination. Do you recall that?

17 A. Yes. Yes.

18 Q. Did you and John have a conversation about -- and I'm
19 sorry, let me ask one additional question.

20 was John, again, somebody who was working in the
21 package scheme?

22 A. Yes, ma'am. John was somebody working with us. And
23 then he -- I guess he gave Ego's address, right? The package
24 went to Ego's address. So John was responsible for it because
25 in a way he's kind of the address. Now, the when the package

1 came it was missing some money.

2 Then, John, I guess, go talk to Ego. Because at that
3 time I wasn't here but that's what they explain to me.

4 Q. Okay. So let me stop you there for a second. So did
5 you have a conversation with John about the package that went to
6 Ego's house?

7 A. Afterward, yes.

8 Q. Okay. And what was the conversation you had with
9 John?

10 A. The same thing, how Ego rough up like his mother to
11 get the missing money.

12 Q. Okay.

13 A. And then -- because that's what Jay and John were
14 talking but John -- I mean, Jay talked to me like in his car
15 with that, and then we went and talked to John. And that's how
16 I would say, it's kind of some kind of opinion for Ego, because
17 when we learned that, like, Jay would be like okay, he did that.
18 And John kind of vouched for him, and that's how I would say he
19 was able to get the in with us basically.

20 Q. And he being Ego?

21 A. Yeah, to keep Ego. To even invite him. I don't know
22 if he called Ego separately, but like that's how they were able
23 to say, okay, this guy can work with us basically, yes.

24 Q. Now, I'm going to direct your attention your attention
25 to something a little bit different and it's bringing your

1 attention back to a conversation you had with Ego about how you
2 learned about where the money was coming from. Do you recall
3 that?

4 A. Yes.

5 Q. Now okay. Now on direct examination and in your
6 cross-examination, you used the word convincing the people to
7 send the money. What do you understand by the word convincing?

8 A. When -- okay. I would say everybody is accused
9 basically, how they doing it, basically. Because I even heard
10 question from other people, like the group how they do that, how
11 they do that because everybody was curious. But when this thing
12 happen, I -- what happened is the sender, when they send the
13 package, she left her phone number. I said she because I
14 believe that was a she, but let me -- that person left the phone
15 number. That it's a woman that got the package, that have
16 gotten the package. She called that person. They conversate.
17 So I guess that person said --

18 MR. GUILLAUME: Objection as to what was said, Your
19 Honor.

20 THE COURT: Sustained. Sustained.

21 BY MS. GOO:

22 Q. Okay. And again Mr. -- so I want to make sure that
23 I'm clear about my question. So you have this conversation
24 about what happened with Ego, correct?

25 A. Yes.

1 Q. And when you were describing -- so the two of you come
2 to a conclusion, or you're discussing a number of things about
3 where the money is coming from.

4 A. Yes.

5 Q. Okay. And do you recall using the word convincing
6 specifically?

7 A. I --

8 Q. Just --

9 A. I'm paraphrasing, but yes.

10 Q. So is there any other word? What do you mean by
11 convincing?

12 A. You can say -- that's my wording, I'm paraphrasing. I
13 would say tricking you. I'm -- like -- persuading you, like
14 this, that, and the third. But I don't know how they did it but
15 it was this type of stuff. I would say how to get that party to
16 send whatever they want to them to send.

17 MS. GOO: Your Honor, I have no further questions.

18 THE COURT: Thank you very much, Ms. Goo.

19 Any recross Mr. Guillaume?

20 MR. GUILLAUME: No, Your Honor.

21 THE COURT: Thank you very much Mr. Charlemagne. You
22 may step down, sir.

23 Now, sir, you should not discuss your testimony with
24 anyone except your lawyer, obviously, Mr. Kramer, in the
25 unlikely event you're called back to the witness stand. Thank

1 you very much.

2 THE WITNESS: Can I -- am I going to call back today
3 or you don't --

4 THE COURT: I don't know, sir. You're excused, sir.

5 THE WITNESS: Outside here?

6 THE COURT: You are excused from testifying and you
7 may leave the courthouse, and your lawyer will explain that to
8 you. You're not to discuss it with anyone else in the unlikely
9 event that you're called back to the witness stand.

10 THE WITNESS: Okay.

11 THE COURT: So you're excused, sir. Thank you very
12 much.

13 THE WITNESS: No problem. Thank you.

14
15
16 CERTIFICATE OF OFFICIAL REPORTER.

17
18 I, Kassandra L. McPherson, Registered Professional
19 Reporter, in and for the United States District Court for the
20 District of Maryland, do hereby certify, pursuant to 28 U.S.C. §
21 753, that the foregoing is a true and correct transcript of the
stenographically-reported proceedings held in the above-entitled
matter and that the transcript page format is in conformance
with the regulations of the Judicial Conference of the United
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22 Dated this 13th day of June 2023.

23 -S-

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KASSANDRA L. MCPHERSON, RPR
25 FEDERAL OFFICIAL COURT REPORTER

\$	52:19, 52:22, 54:3 2023 [2] - 1:9, 63:22 21 [1] - 19:11 2165 [1] - 3:17 28 [1] - 63:18	60:22 above-entitled [1] - 63:19 account [5] - 23:1, 29:13, 29:18 accounts [2] - 57:23, 58:24 accused [1] - 61:8 Adam [4] - 20:1, 20:6, 20:7 additional [4] - 3:8, 9:1, 54:2, 59:19 address [8] - 21:13, 21:22, 23:11, 42:16, 49:14, 59:23, 59:24, 59:25 addresses [2] - 21:18, 21:20 adjacent [1] - 42:18 advice [1] - 17:18 affect [1] - 26:11 afterwards [2] - 10:7, 31:10 ago [4] - 27:19, 47:16, 52:12, 54:21 agree [1] - 25:14 aided [1] - 1:25 airport [5] - 4:19, 4:20, 4:22, 6:5, 6:6 Airport [2] - 4:23, 4:24 Alfred [1] - 1:18 allegations [1] - 40:14 allegedly [5] - 38:8, 38:18, 39:9, 40:1, 41:15 allow [1] - 41:17 allowed [1] - 29:24 almost [2] - 9:9, 17:8 alone [1] - 48:15 Amaya [8] - 7:16, 10:4, 17:9, 18:3, 47:20, 49:4, 52:1, 52:2 AMERICA [1] - 1:3 amount [4] - 13:7, 13:8, 15:20, 29:17 amounts [1] -	13:9 angle [1] - 9:11 answer [7] - 24:25, 25:2, 25:19, 25:20, 43:9, 49:6, 56:5 answered [1] - 43:12 answering [3] - 21:7, 21:16, 58:1 anyway [1] - 41:21 apartment [11] - 33:24, 34:2, 34:5, 34:14, 34:15, 34:24, 34:25, 35:2, 35:3, 35:6, 35:11 APB [1] - 21:10 apologize [1] - 24:8 app [1] - 11:6 appropriate [1] - 57:8 area [6] - 10:3, 14:21, 18:25, 23:9, 23:10, 58:25 argue [1] - 38:4 arrest [1] - 52:22 arrested [6] - 25:6, 26:2, 35:24, 36:2, 36:13, 53:1 ASAP [3] - 19:18, 19:25, 20:6 assault [1] - 46:17 assaulted [4] - 46:1, 46:2, 46:14, 47:4 Assistant [1] - 1:16 attention [8] - 9:16, 18:7, 19:12, 19:17, 41:14, 60:24, 61:1 Attorneys [1] - 1:16 authorities [3] - 25:15, 26:12, 55:12 available [1] - 8:4 AVBORAYE [1] - 1:5 Avenue [1] - 3:18 average [1] - 16:17	aware [4] - 37:13, 37:16, 43:11, 57:11 awhile [1] - 27:20	boss [2] - 22:12, 33:14 bosses [4] - 43:16, 44:7, 44:12, 45:7 bottom [4] - 19:10, 19:16, 19:20, 21:24 box [1] - 31:19 brief [2] - 18:4, 26:24 bring [11] - 7:7, 8:23, 10:3, 10:5, 10:6, 10:19, 11:24, 21:5, 29:3, 38:23 bringing [1] - 60:25 brought [1] - 13:1 Broward [1] - 50:17 building [1] - 28:12 buildings [1] - 28:14 bulk [1] - 31:10 buses [1] - 10:10 business [1] - 45:12 buzz [1] - 15:6 BWI [4] - 4:19, 4:24, 5:3, 5:11 BY [12] - 2:11, 18:5, 19:15, 25:4, 25:18, 25:23, 26:7, 27:5, 53:23, 56:11, 57:16, 61:21 bypassed [1] - 42:2				
1	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	4 4 [1] - 6:10 40 [2] - 21:13, 21:18	5 500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	7 7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	8 8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	9 9th [2] - 4:4, 4:8	A a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	
2	2 [1] - 4:1 20 [4] - 19:10, 19:12, 19:16, 58:13 200 [1] - 16:17 200,000 [2] - 16:20, 16:21 2017 [2] - 35:20, 35:22 2018 [25] - 4:4, 4:8, 4:15, 5:2, 5:11, 6:23, 18:6, 18:7, 18:8, 20:5, 20:21, 35:20, 35:25, 36:3, 36:7, 36:16, 36:17, 36:18, 38:11, 38:15, 39:18, 51:8, 54:21 2019 [8] - 25:9, 35:23, 36:2, 44:9, 45:18,	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23
3	3 [1] - 4:2 10 [1] - 58:13 10,000 [1] - 17:2 100 [1] - 58:13 10:55 [1] - 20:21 10th [3] - 4:15, 5:2, 5:11 11th [1] - 6:14 12:50 [3] - 20:5, 20:6, 20:7 12th [3] - 6:23, 7:17, 7:19 13 [1] - 1:9 13th [1] - 63:22 15 [2] - 29:16, 29:25 16 [2] - 14:2, 50:24 16th [1] - 50:20 18 [2] - 14:2, 50:24 1:10 [1] - 5:2 1:11 [1] - 5:11 1:22 [1] - 20:7 1:50 [1] - 6:23	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8	3 300 [1] - 16:17 3:12 [1] - 4:6 3:13 [1] - 4:8
4	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	4 [1] - 6:10 40 [2] - 21:13, 21:18	
5	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	500 [3] - 16:6, 16:8, 16:11 5D [1] - 1:9	
6	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	6 [4] - 5:6, 19:9, 21:6 60 [5] - 3:11, 3:16, 19:8, 19:13, 19:14 600 [3] - 16:19, 16:22 600,000 [3] - 16:22, 16:23	
7	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	7 [5] - 3:1, 3:2, 19:9, 20:2, 20:5 753 [1] - 63:19	
8	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	8 [6] - 5:25, 6:1, 6:3, 6:4, 20:21 80,000 [1] - 23:1 8:26 [1] - 6:15 8th [1] - 20:17	
9	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	9th [2] - 4:4, 4:8	
A	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	a.m [3] - 5:2, 5:11, 20:21 able [2] - 60:19,	
B	bad [1] - 25:22 badly [1] - 46:18 Baltimore [20] - 1:10, 4:23, 4:24, 5:21, 10:2, 10:3, 11:14, 12:10, 13:17, 14:11, 14:13, 14:14, 14:16, 15:12, 23:9, 52:3, 58:12, 58:14, 58:25 band [1] - 17:2 bands [1] - 17:1 bank [1] - 57:23 base [1] - 41:20 based [2] - 39:6, 40:9 basic [1] - 35:8 beat [2] - 46:14, 46:25 became [3] - 32:1, 57:11, 58:25 become [1] - 8:20 BEFORE [1] - 1:12 begin [1] - 52:16 beginning [2] - 37:17, 57:20 BENNETT [1] - 1:12 Benz [2] - 21:4, 21:8 beside [1] - 15:19 better [1] - 41:21 between [5] - 3:13, 30:19, 38:13, 38:15, 42:21 big [4] - 23:15, 48:17, 49:17, 55:24 bit [7] - 41:13, 45:2, 47:15, 55:17, 57:18, 57:25, 60:25 blah [6] - 23:5, 24:10, 24:11 blocked [2] - 23:2, 58:24 book [2] - 54:25, 55:24 booked [1] - 19:1	bad [1] - 25:22 badly [1] - 46:18 Baltimore [20] - 1:10, 4:23, 4:24, 5:21, 10:2, 10:3, 11:14, 12:10, 13:17, 14:11, 14:13, 14:14, 14:16, 15:12, 23:9, 52:3, 58:12, 58:14, 58:25 band [1] - 17:2 bands [1] - 17:1 bank [1] - 57:23 base [1] - 41:20 based [2] - 39:6, 40:9 basic [1] - 35:8 beat [2] - 46:14, 46:25 became [3] - 32:1, 57:11, 58:25 become [1] - 8:20 BEFORE [1] - 1:12 begin [1] - 52:16 beginning [2] - 37:17, 57:20 BENNETT [1] - 1:12 Benz [2] - 21:4, 21:8 beside [1] - 15:19 better [1] - 41:21 between [5] - 3:13, 30:19, 38:13, 38:15, 42:21 big [4] - 23:15, 48:17, 49:17, 55:24 bit [7] - 41:13, 45:2, 47:15, 55:17, 57:18, 57:25, 60:25 blah [6] - 23:5, 24:10, 24:11 blocked [2] - 23:2, 58:24 book [2] - 54:25, 55:24 booked [1] - 19:1	bad [1] - 25:22 badly [1] - 46:18 Baltimore [20] - 1:10, 4:23, 4:24, 5:21, 10:2, 10:3, 11:14, 12:10, 13:17, 14:11, 14:13, 14:14, 14:16, 15:12, 23:9, 52:3, 58:12, 58:14, 58:25 band [1] - 17:2 bands [1] - 17:1 bank [1] - 57:23 base [1] - 41:20 based [2] - 39:6, 40:9 basic [1] - 35:8 beat [2] - 46:14, 46:25 became [3] - 32:1, 57:11, 58:25 become [1] - 8:20 BEFORE [1] - 1:12 begin [1] - 52:16 beginning [2] - 37:17, 57:20 BENNETT [1] - 1:12 Benz [2] - 21:4, 21:8 beside [1] - 15:19 better [1] - 41:21 between [5] - 3:13, 30:19, 38:13, 38:15, 42:21 big [4] - 23:15, 48:17, 49:17, 55:24 bit [7] - 41:13, 45:2, 47:15, 55:17, 57:18, 57:25, 60:25 blah [6] - 23:5, 24:10, 24:11 blocked [2] - 23:2, 58:24 book [2] - 54:25, 55:24 booked [1] - 19:1	bad [1] - 25:22 badly [1] - 46:18 Baltimore [20] - 1:10, 4:23, 4:24, 5:21, 10:2, 10:3, 11:14, 12:10, 13:17, 14:11, 14:13, 14:14, 14:16, 15:12, 23:9, 52:3, 58:12, 58:14, 58:25 band [1] - 17:2 bands [1] - 17:1 bank [1] - 57:23 base [1] - 41:20 based [2] - 39:6, 40:9 basic [1] - 35:8 beat [2] - 46:14, 46:25 became [3] - 32:1, 57:11, 58:25 become [1] - 8:20 BEFORE [1] - 1:12 begin [1] - 52:16 beginning [2] - 37:17, 57:20 BENNETT [1] - 1:12 Benz [2] - 21:4, 21:8 beside [1] - 15:19 better [1] - 41:21 between [5] - 3:13, 30:19, 38:13, 38:15, 42:21 big [4] - 23:15, 48:17, 49:17, 55:24 bit [7] - 41:13, 45:2, 47:15, 55:17, 57:18, 57:25, 60:25 blah [6] - 23:5, 24:10, 24:11 blocked [2] - 23:2, 58:24 book [2] - 54:25, 55:24 booked [1] - 19:1	bad [1] - 25:22 badly [1] - 46:18 Baltimore [20] - 1:10, 4:23, 4:24, 5:21, 10:2, 10:3, 1				

CERTIFICATE [1] - 63:16 certify [1] - 63:18 chance [1] - 21:16 charge [1] - 22:6 charged [1] - 25:10 charges [1] - 55:5 Charlemagne [8] - 2:5, 2:12, 2:19, 4:2, 27:14, 53:24, 56:12, 62:21 CHARLEMAGNE [2] - 1:11, 2:2 check [2] - 21:9, 22:5 Christine [1] - 1:15 circle [1] - 19:24 cities [6] - 11:11, 11:13, 12:9, 14:22, 48:3, 50:4 city [5] - 11:8, 12:14, 12:16, 48:11 CJA [1] - 1:19 clear [6] - 30:13, 39:2, 48:19, 51:3, 52:17, 61:23 clearly [1] - 2:16 CLERK [2] - 2:3, 2:7 client [11] - 37:20, 37:21, 38:18, 39:9, 42:21, 43:4, 43:7, 48:25, 49:1, 49:2, 51:20 client's [2] - 42:4, 42:16 close [4] - 8:20, 9:9, 14:15, 52:1 collect [2] - 8:13, 8:15 collected [1] - 13:23 collecting [4] - 8:19, 10:21, 15:5, 15:12 coming [8] - 3:20, 5:13, 12:18, 21:15, 58:1, 61:2, 62:3 comment [1] - 57:10 communicate [2] - 7:15, 19:5	communicated [1] - 10:24 communicating [1] - 7:12 communication [1] - 45:20 communication [1] - 56:9 Computer [1] - 1:25 Computer-aided [1] - 1:25 conclusion [1] - 62:2 Conference [1] - 63:20 confidential [1] - 56:9 confirm [10] - 8:23, 13:7, 13:8, 14:9, 14:10, 15:8, 15:19, 15:20, 46:22 confirmed [1] - 15:20 confirming [1] - 12:20 conformance [1] - 63:20 consider [1] - 6:20 contact [6] - 22:2, 43:19, 43:22, 52:13, 54:5, 58:17 contacted [6] - 44:4, 44:8, 44:12, 51:13, 54:18, 54:23 CONTINUED [1] - 2:10 converse [1] - 61:16 conversation [18] - 3:12, 24:18, 37:11, 38:1, 38:8, 38:18, 39:9, 39:11, 39:25, 40:4, 45:21, 56:18, 57:17, 59:18, 60:5, 60:8, 61:1, 61:23 conversations [2] - 6:25, 56:3 convince [2] - 41:23, 58:15 convinced [1] - 40:24 convincing [8] -	39:15, 40:9, 40:20, 41:2, 61:6, 61:7, 62:5, 62:11 cooperate [3] - 25:14, 26:20, 55:18 corner [1] - 17:2 correct [41] - 25:12, 27:22, 27:23, 28:2, 28:5, 29:14, 29:21, 30:3, 30:24, 31:15, 31:24, 32:6, 32:11, 32:17, 33:3, 33:11, 33:17, 33:25, 34:12, 36:25, 37:2, 39:13, 40:22, 41:11, 42:18, 42:21, 43:1, 43:14, 43:22, 45:8, 46:17, 48:8, 48:21, 50:10, 51:3, 51:24, 52:23, 56:6, 61:24, 63:19 corresponding [1] - 5:4 Counsel [1] - 1:19 count [5] - 8:22, 14:19, 15:8, 47:15, 47:25 counted [5] - 10:11, 10:12, 16:13, 47:18 counting [14] - 10:9, 10:17, 12:20, 13:1, 13:2, 13:3, 13:5, 13:12, 14:8, 14:9, 15:15, 15:18, 16:19 country [3] - 24:17, 27:20, 36:22 couple [2] - 11:11, 29:24 course [2] - 47:22, 49:22 Court [2] - 25:11, 63:18 COURT [26] - 1:1, 2:8, 19:13, 24:24, 25:1, 25:17, 25:20, 26:4, 26:6, 27:1, 53:17, 53:21,	56:1, 56:10, 56:21, 56:23, 57:1, 57:5, 57:10, 61:20, 62:18, 62:21, 63:4, 63:6, 63:11, 63:24 court's [2] - 18:4, 26:24 courthouse [1] - 63:7 Courtroom [1] - 1:9 Creole [1] - 27:22 crime [2] - 30:18, 30:21 CRIMINAL [1] - 1:4 cross [4] - 27:2, 57:20, 59:11, 61:6 CROSS [1] - 27:4 cross-examination [4] - 27:2, 57:20, 59:11, 61:6 CROSS-EXAMINATION [1] - 27:4 curious [1] - 61:11 cut [3] - 45:12, 45:14	dealership [1] - 21:5 dealing [2] - 26:13, 26:18 dealings [2] - 36:15, 36:18 December [11] - 25:9, 35:23, 36:6, 36:7, 36:16, 38:14, 38:15, 39:21, 39:22, 52:22 decided [3] - 26:20, 31:15, 55:18 Defendant [2] - 1:6, 1:17 Delaney [1] - 1:15 deleted [2] - 53:7, 53:10 delve [1] - 57:8 demanding [4] - 22:13, 22:18, 22:19, 33:14 described [2] - 9:17, 30:15 describing [1] - 62:1 detail [2] - 39:19, 39:20 details [8] - 25:22, 25:24, 26:2, 40:17, 55:19, 55:21, 55:22, 56:18 DiAngelo [2] - 5:18, 5:19 different [11] - 7:12, 11:11, 12:11, 23:7, 33:11, 41:10, 41:11, 48:3, 52:18, 59:6, 60:25 differently [1] - 11:10 difficulty [1] - 57:25 DIRECT [1] - 2:10 direct [7] - 2:20, 3:11, 43:19, 55:16, 59:16, 60:24, 61:5 directed [1] - 37:7 directing [1] - 19:12 directly [1] - 2:14 disappearing [1] - 45:13 discuss [2] -	62:23, 63:8 discussed [4] - 38:22, 39:14, 39:16, 39:19 discussing [1] - 62:2 discussion [2] - 8:11, 57:21 distribute [1] - 33:16 District [4] - 25:11, 63:18, 63:18 DISTRICT [2] - 1:1, 1:1 DIVISION [1] - 1:2 divulging [1] - 56:9 dollars [2] - 32:16, 32:21 done [6] - 7:7, 10:7, 13:12, 13:14, 28:22, 51:25 Door [3] - 5:25, 6:1, 6:3 dots [1] - 21:24 down [3] - 21:11, 21:12, 62:22 drop [6] - 14:23, 16:7, 17:16, 17:23, 48:4, 48:17 dropped [1] - 48:15 dropping [1] - 15:15 drops [3] - 48:12, 49:3, 49:22 duly [1] - 2:2 during [6] - 10:14, 19:4, 32:10, 37:13, 43:11, 49:21
					E
					earn [1] - 32:10 easier [4] - 9:13, 30:22, 58:9, 58:25 efforts [1] - 45:22 EGHOSASERE [1] - 1:5 Ego [56] - 2:23, 3:5, 3:13, 3:17, 3:19, 4:17, 5:2, 5:4, 6:11, 6:24, 7:12, 7:18, 8:17, 8:18, 8:20, 9:4,

10:4, 17:10, 17:11, 17:15, 17:23, 19:4, 19:22, 20:9, 20:23, 22:7, 23:5, 35:4, 37:19, 37:20, 38:13, 38:22, 39:6, 41:21, 42:14, 47:20, 51:13, 51:14, 51:22, 52:1, 52:3, 52:5, 58:18, 60:2, 60:10, 60:16, 60:20, 60:21, 60:22, 61:1, 61:24 Ego's [6] - 42:13, 59:12, 59:15, 59:23, 59:24, 60:6 either [2] - 18:2, 43:5 elder [1] - 55:8 elderly [14] - 37:22, 38:19, 38:21, 38:25, 39:4, 39:5, 39:13, 39:14, 39:17, 40:6, 40:8, 40:25, 57:12 elders [1] - 40:10 end [10] - 8:15, 9:22, 11:18, 13:23, 15:14, 17:6, 35:22, 35:23, 35:25, 59:11 English [1] - 41:21 enter [1] - 34:14 entitled [1] - 63:19 Esquire [3] - 1:15, 1:18 essentially [1] - 56:5 established [1] - 51:3 event [2] - 62:25, 63:9 eventually [2] - 24:13, 25:6 evidence [3] - 40:15, 57:7, 57:11 exactly [3] - 12:18, 42:15,	56:8 EXAMINATION [3] - 2:10, 27:4, 53:22 examination [8] - 2:20, 27:2, 55:16, 57:20, 59:11, 59:16, 61:5, 61:6 except [2] - 35:4, 62:24 EXCERPT [1] - 1:11 excluding [1] - 48:22 excuse [2] - 30:5, 56:21 excused [3] - 63:4, 63:6, 63:11 Exhibit [7] - 3:1, 3:2, 3:10, 3:16, 19:8, 19:13, 19:14 exhibit [1] - 8:9 existed [2] - 30:23, 30:24 explain [3] - 3:14, 60:3, 63:7 explained [1] - 17:20 explaining [1] - 38:5 explored [1] - 57:13 extent [2] - 18:7, 57:12 extra [2] - 8:15, 16:7	63:24 federal [5] - 25:10, 25:14, 26:12, 55:12, 55:19 FedEx [2] - 23:13, 24:5 felt [2] - 23:2, 57:11 few [3] - 27:8, 27:19, 50:25 fill [2] - 21:24, 21:25 finally [1] - 24:21 fine [2] - 46:21, 57:13 finished [2] - 13:5, 22:9 first [32] - 2:21, 3:11, 3:14, 3:15, 5:9, 7:4, 11:16, 15:17, 17:17, 19:17, 20:5, 21:9, 22:22, 22:24, 25:21, 26:8, 28:4, 28:9, 29:9, 30:25, 31:5, 31:9, 31:17, 35:20, 37:12, 46:16, 47:1, 57:21, 58:3, 59:5 five [3] - 10:8, 12:13, 18:1 flight [1] - 21:3 Florida [7] - 3:18, 28:7, 28:15, 28:16, 41:15, 42:4, 42:16 focus [8] - 7:3, 7:4, 9:16, 13:20, 18:7, 19:17, 41:14, 47:15 focusing [2] - 12:3, 12:21 folks [2] - 14:12, 15:11 follow [2] - 7:1, 41:24 follow-up [1] - 7:1 following [4] - 5:1, 5:23, 6:7, 6:18 FOR [1] - 1:1 foregoing [1] - 63:19 forgive [1] - 29:4 format [1] - 63:20 fortunes [1] - 26:13	fought [1] - 46:4 Four [1] - 21:3 four [2] - 10:8, 12:13 fraud [3] - 55:9, 57:12, 58:3 fraudulent [1] - 28:17 French [3] - 27:25, 43:24, 43:25 Friday [1] - 10:17 friend [4] - 15:3, 15:4, 28:12, 42:13 friend's [1] - 29:13 friends [1] - 41:17 front [1] - 57:8 frozen [1] - 58:24 full [1] - 32:1 full-time [1] - 32:1 fully [1] - 41:9 funny [1] - 23:21	Government's [4] - 3:1, 3:10, 19:8, 19:13 grasp [1] - 40:11 greedy [2] - 54:22, 55:2 Green [2] - 46:11, 46:20 group [7] - 5:18, 5:19, 12:10, 12:12, 12:13, 23:12, 61:10 guess [17] - 6:4, 7:1, 15:25, 20:11, 29:2, 34:21, 44:9, 44:14, 47:1, 51:12, 51:13, 53:12, 56:16, 59:23, 60:2, 61:17 Guillaume [12] - 1:18, 27:2, 53:17, 54:1, 55:7, 55:11, 55:14, 57:5, 57:21, 58:1, 59:14, 62:19 GUILLAUME [11] - 24:23, 25:16, 26:3, 27:3, 27:5, 53:16, 55:25, 56:19, 57:6, 61:18, 62:20 guilty [1] - 55:5 gun [1] - 23:19 gunpoint [1] - 23:25 guy [8] - 12:14, 12:16, 12:19, 17:19, 23:17, 46:20, 48:23, 60:23 guys [1] - 30:20	help [1] - 9:13 hereby [1] - 63:18 hesitate [1] - 58:2 hmm [1] - 11:9 hold [6] - 14:24, 32:7, 39:6, 50:1, 56:20 home [7] - 13:16, 23:4, 42:4, 42:8, 50:17 homeowners [2] - 41:17 homes [1] - 42:9 honest [1] - 54:18 honestly [2] - 23:7, 43:23 Honor [13] - 2:9, 26:3, 26:25, 27:3, 53:19, 55:25, 56:7, 56:19, 57:6, 57:15, 61:19, 62:17, 62:20 HONORABLE [1] - 1:12 hoping [1] - 24:4 hospitals [1] - 22:3 hotel [3] - 11:23, 14:4 House [2] - 14:2, 50:21 house [12] - 21:8, 22:5, 23:5, 41:18, 42:18, 52:24, 53:2, 53:3, 58:12, 58:15, 59:12, 60:6 houses [2] - 58:12, 58:13 hundred [1] - 30:12 hurting [1] - 40:11	
	F		G	gained [1] - 56:5 gap [1] - 21:25 general [3] - 17:21, 17:22, 38:25 generally [1] - 22:12 Ghost [1] - 2:23 girlfriend [2] - 21:9, 52:3 given [1] - 13:11 glad [1] - 48:19 gonna [3] - 2:21, 21:10, 58:18 Goo [7] - 1:15, 2:8, 27:1, 29:9, 53:18, 57:13, 62:18 GOO [20] - 2:9, 2:11, 18:4, 18:5, 19:14, 19:15, 25:4, 25:18, 25:23, 26:5, 26:7, 26:24, 53:19, 53:23, 56:7, 56:11, 57:15, 57:16, 61:21, 62:17 government [1] - 55:19 Government [4] - 3:2, 3:16, 19:14, 40:13	H	I
	fact [7] - 27:13, 29:20, 29:23, 33:10, 40:5, 40:9, 48:2 facts [1] - 26:9 fair [4] - 22:10, 24:3, 56:12, 59:2 false [1] - 28:24 familiar [2] - 50:12, 50:18 family [2] - 26:13, 45:21 far [2] - 39:15, 54:19 FBI [2] - 28:23, 40:6 FEDERAL [1] -		Haiti [2] - 27:16, 50:9 Haitian [1] - 27:22 hard [4] - 17:18, 31:12, 31:14, 40:10 headache [1] - 23:3 hear [1] - 18:12 heard [2] - 21:6, 61:9 heavy [1] - 59:1 held [1] - 63:19	idea [2] - 40:6, 42:25 IGBENIDION [1] - 1:6 IN [1] - 1:1 incentive [1] - 15:25 incident [2] - 31:19, 41:14 including [1] - 5:1 income [1] - 38:19 Indian [1] - 12:4		

Indian-type ^[1] - 12:4 individual ^[2] - 46:10, 47:8 indulgence ^[2] - 18:4, 26:24 information ^[16] - 3:19, 10:24, 17:21, 17:22, 44:23, 51:14, 51:19, 51:23, 53:7, 53:10, 55:4, 55:8, 55:13, 56:4, 56:5, 56:13 informed ^[2] - 40:14, 45:7 inside ^[1] - 25:22 interaction ^[2] - 42:21, 43:5 international ^[1] - 4:23 investigation ^[1] - 55:20 invite ^[1] - 60:21 involved ^[8] - 3:12, 21:21, 23:19, 23:24, 26:15, 29:21, 54:10, 56:17 involving ^[1] - 29:10 issue ^[1] - 46:24	37:7, 37:13, 42:17, 42:24, 43:12, 43:13, 43:22, 44:8, 45:4, 45:12, 45:21, 46:13, 46:17, 46:22, 47:4, 47:22, 47:23, 48:14, 48:22, 51:2, 51:6, 51:8, 51:14, 51:16, 51:21, 52:12, 52:17, 54:11, 54:20, 54:22, 58:5, 60:13, 60:14, 60:17 Jay's ^[5] - 35:9, 44:23, 45:21, 52:6, 54:5 jeopardize ^[1] - 48:1 Jersey ^[1] - 11:15 jewelry ^[5] - 15:6, 49:10, 49:12, 49:14 John ^[18] - 42:11, 42:15, 43:6, 43:7, 58:17, 59:10, 59:11, 59:18, 59:20, 59:22, 59:24, 60:2, 60:5, 60:9, 60:13, 60:14, 60:15, 60:18 Judge ^[1] - 1:12 Judicial ^[1] - 63:20 July ^[8] - 4:4, 4:8, 4:15, 5:2, 5:11, 6:14, 6:23, 20:1 June ^[2] - 1:9, 63:22 jury ^[1] - 57:9 JURY ^[1] - 1:11	41:19, 42:1, 48:1, 52:3, 54:22, 58:8, 59:1, 59:8, 59:25, 60:16, 60:18 knowledge ^[1] - 32:5 known ^[2] - 27:10, 43:16 Kramer ^[4] - 55:23, 56:13, 62:24	live ^[1] - 26:13 lived ^[3] - 5:20, 35:13, 50:8 Lo ^[4] - 5:13, 5:16, 5:17 local ^[1] - 22:3 location ^[18] - 7:10, 7:14, 7:21, 7:24, 10:19, 10:22, 11:1, 11:2, 11:3, 12:24, 12:25, 13:17, 14:5, 15:17, 21:22, 23:12, 23:16, 38:2 locations ^[2] - 11:22, 15:11 locked ^[1] - 10:16 look ^[1] - 23:16 looking ^[4] - 12:4, 23:10, 44:8, 44:23 losing ^[1] - 26:13 lost ^[1] - 23:25 loud ^[1] - 21:1 lying ^[2] - 39:20	- 63:24 mean ^[33] - 5:15, 6:4, 12:2, 14:18, 15:25, 16:9, 17:8, 18:2, 18:24, 20:2, 21:14, 22:13, 24:10, 26:16, 28:21, 29:5, 30:9, 30:16, 32:8, 34:21, 38:11, 40:23, 42:10, 44:11, 47:1, 47:22, 49:19, 53:2, 54:22, 58:10, 58:11, 60:14, 62:10 meaning ^[5] - 9:25, 10:7, 25:1, 58:17 Medard ^[2] - 18:14, 45:5 meet ^[10] - 12:1, 12:13, 12:14, 12:15, 13:16, 13:24, 14:6, 14:12, 17:19, 34:23 meeting ^[3] - 12:10, 12:22, 56:13 member ^[1] - 23:11 members ^[1] - 27:10 mentioned ^[3] - 17:11, 27:18, 59:10 mentions ^[1] - 21:18 message ^[22] - 3:14, 3:15, 3:17, 3:21, 4:3, 4:7, 4:10, 4:14, 4:16, 4:18, 5:12, 5:14, 6:7, 6:16, 6:19, 7:17, 7:18, 19:17, 20:18, 20:22, 20:24, 21:1 messages ^[11] - 3:7, 3:8, 3:15, 4:25, 5:9, 5:24, 6:11, 19:20, 19:21, 19:24, 20:4 met ^[10] - 12:21, 15:11, 21:17, 28:4, 28:9,	30:25, 40:13, 43:4, 55:12 Miami ^[22] - 11:14, 11:16, 11:19, 12:3, 12:9, 12:21, 13:15, 13:19, 15:11, 37:2, 48:21, 50:1, 50:5, 50:7, 50:8, 50:9, 51:13, 52:4, 58:7, 58:13, 58:14, 58:16 microphone ^[1] - 2:15 middle ^[3] - 2:19, 37:17, 37:18 million ^[2] - 32:16, 32:21 mind ^[3] - 12:5, 16:18, 23:10 mine ^[1] - 28:12 missing ^[11] - 18:8, 22:6, 23:14, 44:5, 44:7, 44:13, 51:8, 52:12, 60:1, 60:11 mistaken ^[1] - 29:1 moment ^[6] - 4:2, 25:5, 36:19, 47:16, 52:12, 53:20 moments ^[1] - 27:19 money ^[97] - 8:22, 8:24, 9:1, 9:2, 9:5, 9:17, 9:20, 9:21, 9:23, 9:24, 10:9, 10:11, 10:12, 10:18, 10:19, 10:21, 11:7, 11:18, 11:21, 11:25, 12:20, 13:2, 13:3, 13:6, 13:12, 13:23, 14:8, 14:9, 14:20, 14:23, 15:5, 15:8, 15:12, 15:15, 15:18, 15:19, 15:20, 16:7, 16:13, 16:15, 16:24, 17:6, 17:13, 17:16, 23:19, 23:21, 23:22, 24:1,		
J	jail ^[5] - 8:20, 18:21, 19:1, 19:2, 51:17 January ^[1] - 7:17 Jay ^[77] - 10:25, 11:3, 12:19, 13:8, 13:16, 14:18, 15:8, 16:3, 16:5, 18:8, 18:11, 18:12, 18:14, 18:15, 18:16, 18:18, 22:6, 22:12, 28:2, 28:4, 28:10, 29:10, 29:14, 30:4, 30:6, 30:19, 30:21, 31:1, 31:7, 32:16, 32:19, 32:23, 33:4, 33:5, 34:24, 35:16, 35:18, 35:19, 36:15, 36:18,	L	lady ^[1] - 38:3 landed ^[1] - 5:3 languages ^[1] - 28:2 last ^[10] - 2:4, 3:6, 5:14, 6:11, 6:16, 10:8, 19:9, 20:13, 21:6, 24:16 lawyer ^[6] - 56:4, 56:5, 56:23, 57:1, 62:24, 63:7 lawyers ^[1] - 22:2 lead ^[1] - 56:7 learn ^[3] - 26:1, 26:2, 55:22 learned ^[7] - 51:17, 52:21, 55:8, 55:19, 56:12, 60:17, 61:2 lease ^[4] - 34:14, 34:19, 34:20 leased ^[1] - 34:2 least ^[3] - 29:13, 29:24, 43:24 leave ^[11] - 10:16, 13:10, 14:10, 15:9, 15:21, 17:23, 22:20, 22:22, 24:13, 24:15, 63:7 left ^[7] - 23:8, 24:14, 24:20, 27:19, 54:20, 61:13, 61:14 license ^[1] - 21:11 life ^[2] - 23:24, 50:9 line ^[2] - 54:6, 55:14 listen ^[2] - 45:15, 54:23	M	ma'am ^[1] - 59:22 machine ^[4] - 13:1, 15:7, 17:4 mad ^[1] - 35:4 main ^[1] - 15:2 manager ^[1] - 8:11 Manhattan ^[1] - 49:16 manhattan ^[1] - 49:17 maps ^[1] - 50:19 marked ^[4] - 2:25, 3:10, 19:10, 19:16 MARYLAND ^[1] - 1:1 Maryland ^[3] - 1:10, 25:11, 63:18 matched ^[1] - 13:9 matter ^[2] - 29:20, 63:20 MCARNOLD ^[2] - 1:11, 2:2 McArnold ^[1] - 2:5 McPherson ^[1] - 63:17 MCPHERSON ^[1]		
K	Kassandra ^[1] - 63:17 KASSANDRA ^[1] - 63:24 keep ^[1] - 60:21 kept ^[1] - 59:8 kind ^[23] - 8:14, 8:20, 17:17, 17:19, 22:23, 23:9, 23:10, 23:24, 31:3, 31:12, 37:19,						

24:3, 28:11, 29:12, 30:2, 32:4, 32:5, 32:6, 32:9, 32:23, 33:6, 33:7, 33:8, 33:9, 33:10, 33:16, 34:6, 34:7, 34:11, 34:12, 35:11, 37:14, 37:16, 37:21, 38:20, 39:3, 39:12, 39:15, 44:5, 47:2, 47:15, 47:18, 47:25, 48:2, 48:4, 48:12, 48:15, 48:17, 49:2, 49:22, 51:22, 60:1, 60:11, 61:2, 61:7, 62:3 money's [1] - 23:14 month [6] - 34:19, 36:4, 38:10, 38:12, 38:17 monthly [2] - 34:4, 34:5 morning [6] - 2:12, 2:13, 2:22, 27:6, 27:7, 55:17 most [2] - 14:14, 56:17 mostly [2] - 11:14, 11:15 Motel [2] - 5:6 motel [3] - 7:8, 10:5, 10:14 mother [4] - 42:21, 43:5, 59:15, 60:10 motivation [1] - 26:11 move [2] - 41:3, 57:13 moving [2] - 7:11, 57:15	nature [4] - 40:8, 56:6, 57:7, 57:10 necessarily [2] - 38:24, 39:4 need [2] - 56:8, 57:14 neighborhoods [1] - 50:13 never [13] - 21:15, 33:5, 35:1, 37:21, 39:17, 43:8, 43:25, 44:2, 46:4, 47:21, 48:25, 49:2 New [10] - 11:15, 14:25, 15:1, 15:12, 16:3, 16:25, 48:21, 49:9, 49:21 new [1] - 52:4 next [16] - 3:21, 4:7, 4:9, 4:10, 4:25, 5:8, 5:12, 7:22, 7:24, 10:16, 12:16, 14:4, 19:20, 21:21, 42:15, 53:6 nice [4] - 11:23, 34:15, 34:17 night [1] - 21:14 NO [1] - 1:4 NORTHERN [1] - 1:2 notes [1] - 1:25 nothing [4] - 30:18, 31:1, 31:3, 59:7 November [2] - 36:5, 36:7 number [6] - 14:6, 54:1, 55:7, 61:13, 61:15, 62:2	occur [1] - 38:9 occurred [1] - 38:9 October [6] - 18:7, 20:2, 20:5, 20:17, 20:21, 51:8 OF [4] - 1:1, 1:3, 1:11, 63:16 official [2] - 21:13, 21:18 OFFICIAL [2] - 63:16, 63:24 once [10] - 7:15, 8:20, 10:11, 12:19, 12:24, 16:15, 22:20, 36:24, 47:6, 49:22 one [37] - 6:18, 7:6, 7:20, 7:21, 9:1, 11:8, 12:18, 14:5, 15:2, 16:19, 17:17, 19:5, 20:5, 20:7, 21:10, 21:17, 25:5, 29:13, 30:12, 31:19, 39:25, 42:9, 43:21, 43:24, 44:4, 46:2, 46:13, 46:17, 48:11, 48:13, 48:23, 50:24, 51:9, 53:19, 59:19 opened [1] - 10:11 opening [3] - 9:2, 9:5, 9:22 operation [9] - 5:7, 5:22, 11:11, 30:14, 31:15, 32:11, 34:24, 35:19, 36:21 opinion [1] - 60:16 opportunity [2] - 26:9, 54:21 opposed [2] - 7:25, 39:4 organization [9] - 8:11, 22:9, 22:20, 24:8, 27:10, 41:6, 42:12, 46:11, 47:9 ourselves [2] - 8:7 outside [1] - 63:5 overruled [1] -	25:17 own [4] - 28:11, 28:14, 35:8, 37:9 P p.m [6] - 4:6, 4:8, 6:15, 6:23, 20:5, 21:6 pack [1] - 17:4 package [57] - 3:20, 3:24, 7:14, 7:23, 10:6, 10:8, 11:11, 21:22, 23:8, 23:11, 23:13, 23:16, 23:21, 24:4, 24:6, 30:14, 30:19, 30:23, 31:1, 31:5, 31:9, 31:11, 31:13, 31:14, 31:15, 31:19, 32:1, 32:6, 32:8, 32:10, 33:2, 36:25, 38:3, 42:3, 42:18, 46:24, 48:2, 54:2, 54:9, 54:10, 54:13, 54:17, 54:24, 57:22, 58:3, 58:6, 58:16, 58:18, 59:7, 59:21, 59:23, 59:25, 60:5, 61:13, 61:15, 61:16 packaged [1] - 16:24 packages [24] - 7:15, 8:13, 8:15, 8:19, 8:22, 9:2, 9:5, 9:20, 9:22, 10:2, 10:4, 10:12, 16:10, 24:1, 37:14, 37:22, 38:20, 41:18, 58:20, 59:3, 59:5, 59:12 packaging [2] - 31:10, 59:1 packing [1] - 30:21 page [12] - 4:1, 4:2, 4:10, 5:8, 6:10, 19:9, 19:10, 19:12,	19:16, 20:13, 63:20 paid [20] - 8:7, 16:10, 16:11, 31:2, 31:3, 33:1, 33:3, 33:4, 34:4, 34:9, 34:11, 34:12, 51:6, 51:9, 51:11, 51:20, 54:24, 59:7 Paliwal [1] - 47:9 Papaluca [1] - 3:18 paraphrasing [2] - 62:9, 62:12 part [8] - 5:18, 5:19, 14:18, 23:11, 25:6, 26:17, 34:17, 46:16 participants [1] - 3:11 particular [1] - 40:25 party [1] - 62:15 pay [12] - 15:17, 15:18, 15:22, 15:24, 16:1, 16:3, 30:7, 33:6, 33:7, 33:8, 33:11, 34:6 paying [2] - 8:6, 51:2 payment [1] - 8:15 people [50] - 8:24, 9:1, 9:17, 9:25, 10:1, 10:2, 10:18, 12:10, 12:13, 15:5, 18:24, 19:1, 26:13, 27:13, 33:3, 33:7, 33:11, 33:21, 34:23, 37:22, 38:19, 39:15, 40:11, 41:2, 41:6, 41:10, 41:20, 41:22, 41:23, 41:25, 43:12, 43:16, 44:2, 44:15, 45:7, 48:1, 48:2, 48:12, 52:2, 52:12, 58:15, 58:17, 58:19, 61:6, 61:10 percent [3] - 29:17, 29:25,	30:12 period [1] - 19:4 person [9] - 3:1, 12:22, 13:25, 30:7, 38:22, 44:22, 61:14, 61:16, 61:17 personal [1] - 40:4 personally [2] - 34:4, 41:16 persons [1] - 40:24 persuading [1] - 62:13 phone [6] - 9:11, 18:22, 53:8, 53:10, 61:13, 61:14 phonetic [1] - 48:23 Photo [1] - 28:18 pick [9] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:6, 8:22, 33:2, 38:3 picked [1] - 10:8 picking [5] - 8:14, 8:18, 10:1, 16:9, 16:10 picture [1] - 47:13 Pierre [5] - 28:5, 29:20, 30:7, 30:10, 45:10 place [2] - 28:12, 49:17 placed [1] - 29:17 places [2] - 7:12, 41:10 Plaintiff [2] - 1:3, 1:14 plate [1] - 21:11 pled [1] - 55:5 plus [1] - 23:22 point [17] - 5:4, 7:13, 10:13, 18:8, 20:10, 27:19, 31:5, 36:3, 36:8, 36:10, 44:4, 45:10, 45:20, 48:25, 52:11, 54:9 points [1] - 33:11 police [1] - 22:3 possibility [1] - 46:8 possible [1] - 45:16 potentially [1] -
N name [15] - 2:3, 2:4, 2:5, 14:19, 21:8, 21:10, 27:14, 44:23, 45:1, 45:5, 45:8, 46:11, 47:8, 47:12, 49:12 names [2] - 12:7, 41:8	objection [12] - 24:23, 25:1, 25:16, 26:3, 55:25, 56:19, 56:23, 57:2, 57:5, 57:6, 61:18 observe [3] - 8:17, 8:18, 13:3 obviously [1] - 62:24 O	opened [1] - 10:11 opening [3] - 9:2, 9:5, 9:22 operation [9] - 5:7, 5:22, 11:11, 30:14, 31:15, 32:11, 34:24, 35:19, 36:21 opinion [1] - 60:16 opportunity [2] - 26:9, 54:21 opposed [2] - 7:25, 39:4 organization [9] - 8:11, 22:9, 22:20, 24:8, 27:10, 41:6, 42:12, 46:11, 47:9 ourselves [2] - 8:7 outside [1] - 63:5 overruled [1] -	p.m [6] - 4:6, 4:8, 6:15, 6:23, 20:5, 21:6 pack [1] - 17:4 package [57] - 3:20, 3:24, 7:14, 7:23, 10:6, 10:8, 11:11, 21:22, 23:8, 23:11, 23:13, 23:16, 23:21, 24:4, 24:6, 30:14, 30:19, 30:23, 31:1, 31:5, 31:9, 31:11, 31:13, 31:14, 31:15, 31:19, 32:1, 32:6, 32:8, 32:10, 33:2, 36:25, 38:3, 42:3, 42:18, 46:24, 48:2, 54:2, 54:9, 54:10, 54:13, 54:17, 54:24, 57:22, 58:3, 58:6, 58:16, 58:18, 59:7, 59:21, 59:23, 59:25, 60:5, 61:13, 61:15, 61:16 packaged [1] - 16:24 packages [24] - 7:15, 8:13, 8:15, 8:19, 8:22, 9:2, 9:5, 9:20, 9:22, 10:2, 10:4, 10:12, 16:10, 24:1, 37:14, 37:22, 38:20, 41:18, 58:20, 59:3, 59:5, 59:12 packaging [2] - 31:10, 59:1 packing [1] - 30:21 page [12] - 4:1, 4:2, 4:10, 5:8, 6:10, 19:9, 19:10, 19:12,	19:16, 20:13, 63:20 paid [20] - 8:7, 16:10, 16:11, 31:2, 31:3, 33:1, 33:3, 33:4, 34:4, 34:9, 34:11, 34:12, 51:6, 51:9, 51:11, 51:20, 54:24, 59:7 Paliwal [1] - 47:9 Papaluca [1] - 3:18 paraphrasing [2] - 62:9, 62:12 part [8] - 5:18, 5:19, 14:18, 23:11, 25:6, 26:17, 34:17, 46:16 participants [1] - 3:11 particular [1] - 40:25 party [1] - 62:15 pay [12] - 15:17, 15:18, 15:22, 15:24, 16:1, 16:3, 30:7, 33:6, 33:7, 33:8, 33:11, 34:6 paying [2] - 8:6, 51:2 payment [1] - 8:15 people [50] - 8:24, 9:1, 9:17, 9:25, 10:1, 10:2, 10:18, 12:10, 12:13, 15:5, 18:24, 19:1, 26:13, 27:13, 33:3, 33:7, 33:11, 33:21, 34:23, 37:22, 38:19, 39:15, 40:11, 41:2, 41:6, 41:10, 41:20, 41:22, 41:23, 41:25, 43:12, 43:16, 44:2, 44:15, 45:7, 48:1, 48:2, 48:12, 52:2, 52:12, 58:15, 58:17, 58:19, 61:6, 61:10 percent [3] - 29:17, 29:25,	30:12 period [1] - 19:4 person [9] - 3:1, 12:22, 13:25, 30:7, 38:22, 44:22, 61:14, 61:16, 61:17 personal [1] - 40:4 personally [2] - 34:4, 41:16 persons [1] - 40:24 persuading [1] - 62:13 phone [6] - 9:11, 18:22, 53:8, 53:10, 61:13, 61:14 phonetic [1] - 48:23 Photo [1] - 28:18 pick [9] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:6, 8:22, 33:2, 38:3 picked [1] - 10:8 picking [5] - 8:14, 8:18, 10:1, 16:9, 16:10 picture [1] - 47:13 Pierre [5] - 28:5, 29:20, 30:7, 30:10, 45:10 place [2] - 28:12, 49:17 placed [1] - 29:17 places [2] - 7:12, 41:10 Plaintiff [2] - 1:3, 1:14 plate [1] - 21:11 pled [1] - 55:5 plus [1] - 23:22 point [17] - 5:4, 7:13, 10:13, 18:8, 20:10, 27:19, 31:5, 36:3, 36:8, 36:10, 44:4, 45:10, 45:20, 48:25, 52:11, 54:9 points [1] - 33:11 police [1] - 22:3 possibility [1] - 46:8 possible [1] - 45:16 potentially [1] -

<p>52:16 present [2] - 16:12, 40:1 presumed [1] - 39:3 pretty [1] - 46:17 previous [1] - 23:21 previously [1] - 41:16 problem [6] - 27:9, 36:20, 39:24, 51:1, 57:4, 63:13 proceed [1] - 2:8 proceedings [1] - 63:19 proceeds [1] - 37:14 Professional [1] - 63:17 promise [1] - 32:19 promised [1] - 32:16 propose [1] - 52:15 pull [1] - 19:8 pulled [1] - 23:19 pursuant [1] - 63:18 pursuit [1] - 32:1 put [6] - 9:11, 10:15, 17:2, 17:4, 21:10, 29:12 putting [2] - 37:19, 38:6</p>	<p>read [10] - 4:10, 4:25, 5:9, 6:16, 19:23, 19:24, 20:3, 20:15, 20:19, 21:1 ready [1] - 5:7 real [3] - 44:23, 45:1, 45:5 realization [1] - 40:16 really [9] - 8:16, 20:11, 24:9, 41:23, 47:22, 50:14, 50:16, 58:14 reason [2] - 46:25, 55:18 receive [4] - 29:25, 32:4, 32:23, 58:23 received [1] - 30:2 recently [2] - 40:5, 40:7 recess [1] - 2:20 recognize [2] - 3:1, 3:12 record [1] - 2:3 recording [1] - 8:22 recross [1] - 62:19 recruit [2] - 41:16 redirect [1] - 53:18 REDIRECT [1] - 53:22 reference [2] - 37:11, 39:12 referencing [2] - 52:19, 56:15 referred [2] - 2:23, 27:14 referring [2] - 43:17, 52:11 regards [1] - 8:18 Registered [1] - 63:17 regulations [1] - 63:20 reimbursed [1] - 8:8 related [4] - 26:9, 32:6, 34:23, 55:13 relation [1] - 24:18 relaxation [1] - 35:6 remember [28] - 14:14, 14:15,</p>	<p>16:19, 20:1, 20:7, 22:24, 23:9, 24:11, 34:21, 34:22, 39:18, 41:8, 42:8, 42:11, 44:18, 44:24, 45:1, 46:10, 46:21, 47:5, 47:8, 47:11, 49:12, 49:14, 49:17, 50:3, 53:13 remembered [1] - 50:23 reminder [1] - 2:14 rent [3] - 33:24, 34:4, 34:5 rephrase [2] - 24:12, 56:1 reported [1] - 63:19 REPORTER [2] - 63:16, 63:24 Reporter [1] - 63:18 request [1] - 11:5 requested [1] - 33:13 respect [1] - 56:6 respond [2] - 5:23, 56:4 responded [1] - 57:11 responsible [5] - 17:11, 17:13, 23:2, 51:2, 59:24 rest [1] - 22:2 retrieve [2] - 36:24, 54:14 return [1] - 3:7 returning [1] - 8:10 review [1] - 26:9 RICHARD [1] - 1:12 road [1] - 14:1 robbed [1] - 23:25 role [1] - 8:11 room [7] - 10:6, 12:17, 12:20, 12:25, 14:6, 15:7, 16:13 rough [1] - 60:10 roughing [1] - 59:15 roughly [1] - 50:2 RPR [1] - 63:24</p>	<p>rubber [2] - 17:1, 17:2 rule [1] - 57:2 rush [1] - 21:2</p> <p>S</p> <p>sanctuary [2] - 35:5, 35:8 Saturday [4] - 21:5, 21:6, 21:14 save [1] - 10:15 saved [1] - 49:15 saw [2] - 30:21, 54:21 scam [1] - 40:6 scheme [11] - 30:8, 30:13, 54:2, 54:10, 55:9, 56:6, 56:17, 57:12, 57:22, 59:21 screen [1] - 8:9 Sean [1] - 1:15 search [1] - 51:15 second [7] - 6:19, 7:17, 20:6, 21:17, 23:8, 24:7, 60:4 see [12] - 12:16, 17:23, 19:6, 19:18, 21:11, 21:12, 22:3, 40:9, 41:19, 51:16, 52:2, 59:9 sell [1] - 15:6 send [20] - 3:25, 7:18, 10:18, 10:25, 11:1, 11:3, 11:5, 21:14, 21:16, 21:18, 21:21, 21:22, 39:15, 58:16, 58:18, 61:7, 61:12, 62:16 sender [2] - 38:3, 61:12 sending [2] - 3:19, 39:3 Senior [1] - 1:12 sent [9] - 3:17, 5:2, 6:7, 6:11, 21:4, 21:8, 41:18, 42:4, 59:12 separate [6] - 16:8, 16:9,</p>	<p>30:14, 30:16, 30:18, 54:10 separately [1] - 60:22 set [3] - 4:25, 6:11, 19:20 seven [1] - 38:17 shirt [1] - 12:18 Shop [1] - 28:18 shortly [1] - 4:7 show [2] - 2:25, 6:10 showed [5] - 3:6, 11:4, 22:25, 25:21, 55:24 showing [1] - 3:10 similar [1] - 55:15 single [2] - 17:8, 50:3 sitting [1] - 39:19 six [2] - 34:19, 38:17 slightly [1] - 56:8 slowly [1] - 2:15 someone [7] - 38:24, 38:25, 39:3, 39:4, 39:5, 42:11, 59:10 sometimes [14] - 8:2, 8:23, 9:24, 10:5, 11:5, 14:13, 17:9, 33:18, 35:12, 35:18, 41:17, 47:20, 51:7 somewhere [2] - 49:15, 49:19 Sooraji [2] - 47:8, 47:11 sorry [13] - 3:21, 4:1, 4:13, 9:4, 16:21, 19:10, 20:15, 21:11, 29:6, 30:16, 41:4, 56:22, 59:19 sort [1] - 42:20 source [3] - 37:16, 38:19, 39:12 spaces [1] - 58:20 speaks [1] - 28:2 specific [3] - 38:12, 51:23, 58:1 specifically [5] - 2:21, 38:19, 39:13, 55:11, 62:6</p>	<p>spell [1] - 2:4 spend [1] - 50:9 spending [1] - 21:2 spot [6] - 5:21, 7:7, 14:19, 35:8, 35:9 stack [2] - 17:2, 17:3 stand [2] - 62:25, 63:9 start [14] - 10:9, 12:20, 13:1, 13:2, 18:24, 21:23, 37:19, 38:5, 38:6, 48:11, 52:5, 58:6, 58:20, 58:24 started [8] - 31:6, 31:11, 35:21, 57:21, 58:3, 58:7, 59:5, 59:9 starting [2] - 11:16, 21:24 state [2] - 2:3, 6:13 State [2] - 36:24, 37:4 states [1] - 41:11 STATES [2] - 1:1, 1:3 States [3] - 1:16, 63:18, 63:21 stations [1] - 22:3 status [1] - 22:4 stay [3] - 13:18, 23:4, 54:10 stayed [6] - 24:17, 35:13, 35:16, 35:18 stenographical y [1] - 63:19 stenographical y-reported [1] - 63:19 stenotype [1] - 1:25 step [1] - 62:22 steps [1] - 17:18 sticking [1] - 52:8 still [3] - 15:3, 21:3, 45:20 stop [4] - 21:17, 36:3, 57:2, 60:4 stopped [2] - 21:16, 31:24 storage [3] - 10:6, 10:15, 10:16 store [3] - 49:10,</p>
Q					
<p>questioning [2] - 54:6, 55:14 questions [11] - 27:8, 39:23, 41:3, 50:25, 53:16, 54:1, 55:7, 55:17, 58:1, 59:14, 62:17 quickly [1] - 56:9</p>					
R					
<p>ran [2] - 19:25, 20:6 RDB-21-00054 [1] - 1:4 re [1] - 26:8 re-ask [1] - 26:8</p>					

49:12, 49:14 stored [1] - 35:11 story [1] - 42:3 straight [2] - 14:2, 14:3 street [3] - 49:18, 50:18, 50:21 Street [1] - 50:21 streets [1] - 50:12 strike [1] - 44:2 striking [2] - 7:3, 57:19 stuff [7] - 17:18, 37:19, 38:6, 50:19, 51:15, 51:22, 62:15 successful [1] - 58:7 summer [1] - 18:6 Sunday [1] - 14:20 supposed [3] - 21:14, 23:12, 24:5 surrender [2] - 53:3, 53:4 sustained [9] - 24:24, 25:1, 26:4, 26:6, 56:1, 61:20 switch [1] - 31:15 sworn [1] - 2:2	48:10, 49:9, 52:8, 62:23 testing [2] - 58:5, 58:22 text [3] - 3:7, 3:8, 12:19 THE [41] - 1:1, 1:1, 1:12, 2:3, 2:5, 2:7, 2:8, 19:13, 24:24, 24:25, 25:1, 25:3, 25:17, 25:20, 25:21, 26:4, 26:6, 27:1, 53:17, 53:21, 56:1, 56:10, 56:20, 56:21, 56:22, 56:23, 56:25, 57:1, 57:4, 57:5, 57:10, 61:20, 62:18, 62:21, 63:2, 63:4, 63:5, 63:6, 63:10, 63:11, 63:13 themselves [1] - 49:5 thereafter [1] - 4:7 third [3] - 20:7, 24:8, 62:14 three [1] - 21:23 throughout [1] - 9:21 ticket [1] - 55:1 timeframe [1] - 38:17 tinted [1] - 12:5 titles [2] - 28:17, 28:24 today [4] - 12:14, 14:4, 48:10, 63:2 together [3] - 12:15, 37:20, 38:6 took [5] - 2:20, 11:4, 16:25, 23:23, 54:9 top [1] - 4:10 topic [1] - 57:8 total [2] - 16:16, 47:3 totally [1] - 30:14 touch [1] - 20:9 towards [1] - 22:16 track [2] - 21:11, 21:12 transcript [2] -	63:19, 63:20 transcription [1] - 1:25 transfer [5] - 29:24, 30:13, 30:24, 31:11, 31:14 transfers [6] - 29:8, 29:9, 29:12, 31:6, 31:9, 32:10 transport [1] - 17:6 transporting [3] - 9:16, 17:13, 17:16 travel [2] - 36:22, 54:17 traveled [1] - 36:24 TRIAL [1] - 1:11 tricking [1] - 62:13 tried [5] - 22:9, 22:22, 24:7, 24:18, 45:12 trip [2] - 16:3, 16:11 truck [1] - 23:13 true [8] - 40:5, 40:7, 42:25, 44:22, 46:16, 50:1, 53:7, 63:19 trust [3] - 9:14, 31:4, 33:20 trusted [2] - 33:19, 33:24 trusting [1] - 52:5 try [2] - 9:10, 22:20 trying [5] - 20:9, 20:16, 40:23, 40:24, 59:2 Tuesday [1] - 1:9 turning [1] - 53:11 two [9] - 3:15, 5:9, 16:20, 17:15, 23:25, 29:14, 40:1, 52:18, 62:1 type [4] - 12:4, 40:25, 56:9, 62:15 types [1] - 11:21	Uber [14] - 3:25, 6:14, 6:25, 7:5, 7:6, 7:8, 7:19, 7:23, 7:25, 8:1, 8:2, 8:3, 11:1, 11:5 Ubers [1] - 8:6 Ulysse [3] - 18:14, 45:4, 45:5 Uncle [2] - 29:20, 30:10 uncle [9] - 28:5, 30:9, 45:10, 45:15, 52:4, 52:6, 52:15, 54:5, 54:25 under [2] - 10:15, 14:19 UNITED [2] - 1:1, 1:3 United [3] - 1:16, 63:18, 63:20 unless [2] - 33:6, 33:8 unlikely [2] - 62:25, 63:8 up [33] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:1, 7:6, 8:14, 8:18, 8:22, 9:17, 10:1, 10:8, 10:12, 11:19, 13:9, 16:3, 16:10, 16:16, 16:25, 17:3, 19:8, 21:15, 21:23, 29:3, 33:2, 38:3, 50:3, 57:18, 59:11, 59:15, 60:10 upset [2] - 45:24, 46:8 urgent [1] - 6:21	60:18 vs [1] - 1:4	W	woman [1] - 61:15 wondering [1] - 21:3 word [5] - 59:8, 61:6, 61:7, 62:5, 62:10 wording [1] - 62:12 words [2] - 40:13, 48:13 workers [7] - 21:3, 21:10, 21:13, 21:18, 22:2, 33:17, 51:6 worried [2] - 18:11, 23:14 worth [1] - 24:1 written [1] - 49:19	
T	target [1] - 42:8 targeted [1] - 42:9 targeting [1] - 42:10 team [2] - 8:3, 48:9 ten [4] - 21:20, 49:24, 50:3, 50:7 Terminal [2] - 5:25, 6:4 terms [2] - 13:19, 56:4 testified [9] - 16:12, 29:23, 38:7, 41:5, 41:15, 42:20, 45:2, 47:16, 59:15 testifying [1] - 63:6 testimony [10] - 31:6, 35:7, 36:12, 38:20, 39:21, 40:19,	themselves [1] - 49:5 thereafter [1] - 4:7 third [3] - 20:7, 24:8, 62:14 three [1] - 21:23 throughout [1] - 9:21 ticket [1] - 55:1 timeframe [1] - 38:17 tinted [1] - 12:5 titles [2] - 28:17, 28:24 today [4] - 12:14, 14:4, 48:10, 63:2 together [3] - 12:15, 37:20, 38:6 took [5] - 2:20, 11:4, 16:25, 23:23, 54:9 top [1] - 4:10 topic [1] - 57:8 total [2] - 16:16, 47:3 totally [1] - 30:14 touch [1] - 20:9 towards [1] - 22:16 track [2] - 21:11, 21:12 transcript [2] -	63:19, 63:20 transcription [1] - 1:25 transfer [5] - 29:24, 30:13, 30:24, 31:11, 31:14 transfers [6] - 29:8, 29:9, 29:12, 31:6, 31:9, 32:10 transport [1] - 17:6 transporting [3] - 9:16, 17:13, 17:16 travel [2] - 36:22, 54:17 traveled [1] - 36:24 TRIAL [1] - 1:11 tricking [1] - 62:13 tried [5] - 22:9, 22:22, 24:7, 24:18, 45:12 trip [2] - 16:3, 16:11 truck [1] - 23:13 true [8] - 40:5, 40:7, 42:25, 44:22, 46:16, 50:1, 53:7, 63:19 trust [3] - 9:14, 31:4, 33:20 trusted [2] - 33:19, 33:24 trusting [1] - 52:5 try [2] - 9:10, 22:20 trying [5] - 20:9, 20:16, 40:23, 40:24, 59:2 Tuesday [1] - 1:9 turning [1] - 53:11 two [9] - 3:15, 5:9, 16:20, 17:15, 23:25, 29:14, 40:1, 52:18, 62:1 type [4] - 12:4, 40:25, 56:9, 62:15 types [1] - 11:21	Uber [14] - 3:25, 6:14, 6:25, 7:5, 7:6, 7:8, 7:19, 7:23, 7:25, 8:1, 8:2, 8:3, 11:1, 11:5 Ubers [1] - 8:6 Ulysse [3] - 18:14, 45:4, 45:5 Uncle [2] - 29:20, 30:10 uncle [9] - 28:5, 30:9, 45:10, 45:15, 52:4, 52:6, 52:15, 54:5, 54:25 under [2] - 10:15, 14:19 UNITED [2] - 1:1, 1:3 United [3] - 1:16, 63:18, 63:20 unless [2] - 33:6, 33:8 unlikely [2] - 62:25, 63:8 up [33] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:1, 7:6, 8:14, 8:18, 8:22, 9:17, 10:1, 10:8, 10:12, 11:19, 13:9, 16:3, 16:10, 16:16, 16:25, 17:3, 19:8, 21:15, 21:23, 29:3, 33:2, 38:3, 50:3, 57:18, 59:11, 59:15, 60:10 upset [2] - 45:24, 46:8 urgent [1] - 6:21	60:18 vs [1] - 1:4	W	woman [1] - 61:15 wondering [1] - 21:3 word [5] - 59:8, 61:6, 61:7, 62:5, 62:10 wording [1] - 62:12 words [2] - 40:13, 48:13 workers [7] - 21:3, 21:10, 21:13, 21:18, 22:2, 33:17, 51:6 worried [2] - 18:11, 23:14 worth [1] - 24:1 written [1] - 49:19
T	target [1] - 42:8 targeted [1] - 42:9 targeting [1] - 42:10 team [2] - 8:3, 48:9 ten [4] - 21:20, 49:24, 50:3, 50:7 Terminal [2] - 5:25, 6:4 terms [2] - 13:19, 56:4 testified [9] - 16:12, 29:23, 38:7, 41:5, 41:15, 42:20, 45:2, 47:16, 59:15 testifying [1] - 63:6 testimony [10] - 31:6, 35:7, 36:12, 38:20, 39:21, 40:19,	themselves [1] - 49:5 thereafter [1] - 4:7 third [3] - 20:7, 24:8, 62:14 three [1] - 21:23 throughout [1] - 9:21 ticket [1] - 55:1 timeframe [1] - 38:17 tinted [1] - 12:5 titles [2] - 28:17, 28:24 today [4] - 12:14, 14:4, 48:10, 63:2 together [3] - 12:15, 37:20, 38:6 took [5] - 2:20, 11:4, 16:25, 23:23, 54:9 top [1] - 4:10 topic [1] - 57:8 total [2] - 16:16, 47:3 totally [1] - 30:14 touch [1] - 20:9 towards [1] - 22:16 track [2] - 21:11, 21:12 transcript [2] -	63:19, 63:20 transcription [1] - 1:25 transfer [5] - 29:24, 30:13, 30:24, 31:11, 31:14 transfers [6] - 29:8, 29:9, 29:12, 31:6, 31:9, 32:10 transport [1] - 17:6 transporting [3] - 9:16, 17:13, 17:16 travel [2] - 36:22, 54:17 traveled [1] - 36:24 TRIAL [1] - 1:11 tricking [1] - 62:13 tried [5] - 22:9, 22:22, 24:7, 24:18, 45:12 trip [2] - 16:3, 16:11 truck [1] - 23:13 true [8] - 40:5, 40:7, 42:25, 44:22, 46:16, 50:1, 53:7, 63:19 trust [3] - 9:14, 31:4, 33:20 trusted [2] - 33:19, 33:24 trusting [1] - 52:5 try [2] - 9:10, 22:20 trying [5] - 20:9, 20:16, 40:23, 40:24, 59:2 Tuesday [1] - 1:9 turning [1] - 53:11 two [9] - 3:15, 5:9, 16:20, 17:15, 23:25, 29:14, 40:1, 52:18, 62:1 type [4] - 12:4, 40:25, 56:9, 62:15 types [1] - 11:21	Uber [14] - 3:25, 6:14, 6:25, 7:5, 7:6, 7:8, 7:19, 7:23, 7:25, 8:1, 8:2, 8:3, 11:1, 11:5 Ubers [1] - 8:6 Ulysse [3] - 18:14, 45:4, 45:5 Uncle [2] - 29:20, 30:10 uncle [9] - 28:5, 30:9, 45:10, 45:15, 52:4, 52:6, 52:15, 54:5, 54:25 under [2] - 10:15, 14:19 UNITED [2] - 1:1, 1:3 United [3] - 1:16, 63:18, 63:20 unless [2] - 33:6, 33:8 unlikely [2] - 62:25, 63:8 up [33] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:1, 7:6, 8:14, 8:18, 8:22, 9:17, 10:1, 10:8, 10:12, 11:19, 13:9, 16:3, 16:10, 16:16, 16:25, 17:3, 19:8, 21:15, 21:23, 29:3, 33:2, 38:3, 50:3, 57:18, 59:11, 59:15, 60:10 upset [2] - 45:24, 46:8 urgent [1] - 6:21	60:18 vs [1] - 1:4	W	woman [1] - 61:15 wondering [1] - 21:3 word [5] - 59:8, 61:6, 61:7, 62:5, 62:10 wording [1] - 62:12 words [2] - 40:13, 48:13 workers [7] - 21:3, 21:10, 21:13, 21:18, 22:2, 33:17, 51:6 worried [2] - 18:11, 23:14 worth [1] - 24:1 written [1] - 49:19
T	target [1] - 42:8 targeted [1] - 42:9 targeting [1] - 42:10 team [2] - 8:3, 48:9 ten [4] - 21:20, 49:24, 50:3, 50:7 Terminal [2] - 5:25, 6:4 terms [2] - 13:19, 56:4 testified [9] - 16:12, 29:23, 38:7, 41:5, 41:15, 42:20, 45:2, 47:16, 59:15 testifying [1] - 63:6 testimony [10] - 31:6, 35:7, 36:12, 38:20, 39:21, 40:19,	themselves [1] - 49:5 thereafter [1] - 4:7 third [3] - 20:7, 24:8, 62:14 three [1] - 21:23 throughout [1] - 9:21 ticket [1] - 55:1 timeframe [1] - 38:17 tinted [1] - 12:5 titles [2] - 28:17, 28:24 today [4] - 12:14, 14:4, 48:10, 63:2 together [3] - 12:15, 37:20, 38:6 took [5] - 2:20, 11:4, 16:25, 23:23, 54:9 top [1] - 4:10 topic [1] - 57:8 total [2] - 16:16, 47:3 totally [1] - 30:14 touch [1] - 20:9 towards [1] - 22:16 track [2] - 21:11, 21:12 transcript [2] -	63:19, 63:20 transcription [1] - 1:25 transfer [5] - 29:24, 30:13, 30:24, 31:11, 31:14 transfers [6] - 29:8, 29:9, 29:12, 31:6, 31:9, 32:10 transport [1] - 17:6 transporting [3] - 9:16, 17:13, 17:16 travel [2] - 36:22, 54:17 traveled [1] - 36:24 TRIAL [1] - 1:11 tricking [1] - 62:13 tried [5] - 22:9, 22:22, 24:7, 24:18, 45:12 trip [2] - 16:3, 16:11 truck [1] - 23:13 true [8] - 40:5, 40:7, 42:25, 44:22, 46:16, 50:1, 53:7, 63:19 trust [3] - 9:14, 31:4, 33:20 trusted [2] - 33:19, 33:24 trusting [1] - 52:5 try [2] - 9:10, 22:20 trying [5] - 20:9, 20:16, 40:23, 40:24, 59:2 Tuesday [1] - 1:9 turning [1] - 53:11 two [9] - 3:15, 5:9, 16:20, 17:15, 23:25, 29:14, 40:1, 52:18, 62:1 type [4] - 12:4, 40:25, 56:9, 62:15 types [1] - 11:21	Uber [14] - 3:25, 6:14, 6:25, 7:5, 7:6, 7:8, 7:19, 7:23, 7:25, 8:1, 8:2, 8:3, 11:1, 11:5 Ubers [1] - 8:6 Ulysse [3] - 18:14, 45:4, 45:5 Uncle [2] - 29:20, 30:10 uncle [9] - 28:5, 30:9, 45:10, 45:15, 52:4, 52:6, 52:15, 54:5, 54:25 under [2] - 10:15, 14:19 UNITED [2] - 1:1, 1:3 United [3] - 1:16, 63:18, 63:20 unless [2] - 33:6, 33:8 unlikely [2] - 62:25, 63:8 up [33] - 3:24, 3:25, 5:5, 5:16, 5:21, 7:1, 7:6, 8:14, 8:18, 8:22, 9:17, 10:1, 10:8, 10:12, 11:19, 13:9, 16:3, 16:10, 16:16, 16:25, 17:3, 19:8, 21:15, 21:23, 29:3, 33:2, 38:3, 50:3, 57:18, 59:11, 59:15, 60:10 upset [2] - 45:24, 46:8 urgent [1] - 6:21	60:18 vs [1] - 1:4	W	woman [1] - 61:15 wondering [1] - 21:3 word [5] - 59:8, 61:6, 61:7, 62:5, 62:10 wording [1] - 62:12 words [2] - 40:13, 48:13 workers [7] - 21:3, 21:10, 21:13, 21:18, 22:2, 33:17, 51:6 worried [2] - 18:11, 23:14 worth [1] - 24:1 written [1] - 49:19
T	target [1] - 42:8 targeted [1] - 42:9 targeting [1] - 42:10 team [2] - 8:3, 48:9 ten [4] - 21:20, 49:24, 50:3, 50:7 Terminal [2] - 5:25, 6:4 terms [2] - 13:19, 56:4 testified [9] - 16:12, 29:23, 38:7, 41:5, 41:15, 42:20, 45:2, 47:16, 59:15 testifying [1] - 63:6 testimony [10] - 31:6, 35:7, 36:12, 38:20, 39:21, 40:19,	themselves [1] - 49:5 thereafter [1] - 4:7 third [3] - 20:7, 24:8, 62:14 three [1] - 21:23 throughout [1] - 9:21 ticket [1] - 55:1 timeframe [1] - 38:17 tinted [1] - 12:5 titles [2] - 28:17, 28:24 today [4] - 12:14, 14:4, 48:10, 63:2 together [3] - 12:15, 37:20, 38:6 took [5] - 2:20, 11:4, 16:25, 23:23, 54:9 top [1] - 4:10 topic [1] - 57:8 total [2] - 16:16, 47:3 totally [1] - 30:14 touch [1] - 20:9 towards [1] - 22:16 track [2] - 21:11, 21:12 transcript [2] -	63:19, 63:20 transcription [1] - 1:25 transfer [5] - 29:24, 30:13, 30:24, 31:11, 31:14 transfers [6] - 29:8, 29:9, 29:12, 31:6, 31:9, 32:10 transport [1] - 17:6 transporting [3] - 9:16, 17:13, 17:16 travel [2] - 36:22, 54:17 traveled [1] - 36:24 TRIAL [1] - 1:11 tricking [1] - 62:13 tried [5] - 22:9, 22:22, 24:7, 24:18, 45:12 trip [2] - 16:3, 16:11 truck [1] - 23:13 true [8] - 40:5, 40:7, 42:25, 44:22, 46:16, 50:1, 53:7, 63:19 trust [3] - 9:14, 31:4, 33:20 trusted [2] - 33:19, 33:24 trusting [1] - 52:5 try [2] - 9:10, 22:20 trying [5] - 20:9, 20:16, 40:23, 40:24, 59:2 Tuesday [1] - 1:9 turning [1] - 53:11 two [9] - 3:15, 5:9, 16:20, 17:15, 23:25, 29:14, 40:1, 52:18, 62:1 type [4] - 12:4, 40:25, 56:9, 62:15 types [1] - 11:21	Uber [14] - 3:25, 6:14, 6:25, 7:5, 7:6, 7:8, 7:19, 7:23, 7:25, 8:1, 8:2, 8:3, 11:1, 11:5 Ubers [1] - 8:6 Ulysse [3] - 18:14, 45:4, 45:5 Uncle [2] - 29:20, 30:10 uncle [9] - 28:5, 30:9, 45:10, 45:15, 52:4, 52:6, 52:15, 54:5, 54:25 under [2] - 10:15, 14:19 UNITED [2] - 1:1, 1:3 United [3] - 1:16, 63:18, 63:20 unless [2] - 33:6, 33:8 unlikely [2] - 62:25, 63:8 up [33] - 3:2			